BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

Blue Casa Communications, Petition for Declaratory Ruling That, Pursuant to the Carve-Out Provisions of 47 U.S.C. § 251(g), Interstate Originating Switched Access Charges, Not Reciprocal Compensation Charges, Apply to ISP-Bound Calls That Are Terminated via VNXX-type Foreign Exchange Arrangements	)))))))	**WC Docket No. 09-8**

@ COMMUNICATIONS, INC. REPLY COMMENTS ON REQUEST FOR DECLARATORY RULING

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EXECUTIVE SUMMARY

The ILECs and Blue Casa say that access has always applied to Virtual CO code service, but their own tariffs belie the claim. Further, they have not in fact acted consistently with this claim, for they are not presently doing the things their tariffs require them to do, and they are doing things their tariffs prohibit absent actions that have not occurred.

The new argument (presented for the first time in initial comments) that Virtual CO code service is "more analogous" to 800 service is wrong, but it too creates serious tariff issues if one accepts the analogy.

Blue Casa and the ILECs that support the petition are not asking for a declaration that their existing access tariffs apply, for they simply do not. What they are really seeking is a ruling they can use to incorporate terms into §§ 251/252 ICAs that substitute access prices rather than § 251(b)(5) (or more properly § 252(d)(2) cost-based) prices for originating end office switching and common transport. Or they are asking for permission to amend their tariffs to cover this activity for the first time. But this activity was never covered by the access regime before or after 1996, since no Commission-approved access tariff describes this arrangement and provides rates for it.

Those who support imposing access on Virtual CO code services are trying to eliminate one of the few remaining pockets of intra-modal competition that exists, and they also have the strategic goal of imposing daunting economic barriers on the independent ISPs that compete with the ILECs' captive affiliated ISP operations. They want to reduce expense, increase revenue and eliminate competition. That is not exactly what the 1996 amendments were designed to accomplish.

Blue Casa and its ILEC supporters have not carried the burden of proof and cannot ever carry the burden. The facts do not support the petition and the law squarely says no. The policy is just plain wrong.

The Petition should be denied.

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@ Communications, Inc. ("@ Com") hereby submits its Reply comments on Blue Casa's Petition for Declaratory Ruling pursuant to the Public Notice of Pleading Cycle.[1]

@ Com believes that other commentors will more than adequately address the legal reasons why Blue Casa's position and the related but slightly different arguments by its ILEC supporters are not plausible and cannot be supported based on the Commission's clear and unequivocal holding in the *Order Answering Mandamus and FNPRM* that "all telecommunications exchanged with LECs is subject to the reciprocal compensation regime in sections 251(b)(5) and 252(d)(2)."[2] @ Com will therefore focus on a further demonstration that the traffic in issue can not have always been subject to ILEC access tariffs – the implementing

[1] Public Notice, *Blue Casa Communications, Petition for Declaratory Ruling That, Pursuant to the Carve-Out Provisions of 47 U.S.C. § 251(g), Interstate Originating Switched Access Charges, Not Reciprocal Compensation Charges, Apply to ISP-Bound Calls That Are Terminated via VNXX-type Foreign Exchange Arrangements*, DA 09-467, WC Docket No. 09-8, (rel. Feb. 25, 2009).

[2] Order on Remand and Report and Order and Further Notice of Proposed Rulemaking, *High Cost Universal Service Reform; Federal-State Joint Board on Universal Service; Lifeline and Link Up; Universal Service Contribution Methodology; Numbering Resource Optimization; Implementation of the Local Competition Provisions in the Telecommunications Act of 1996; Developing a Unified Intercarrier Compensation Regime; Intercarrier Compensation for ISP-Bound Traffic; IP-Enabled Service*s, CC Docket Nos. 96-45, 99-200, 96-98, 01-92, 99-68, WC Docket Nos. 05-337, 03-109, 06-122, 04-36, FCC 08-262 ¶ 16 (rel. Nov. 5, 2008) ("*Order Answering Mandamus and FNPRM*").

mechanism for all traffic that is carved out by § 251(g) – because the ILECs' current access tariffs simply do not contemplate or address the means by which the traffic is handled.

First, @ Com will briefly mention certain things the ILECs and Blue Casa have not done, but they should have done, if they really did think their access tariffs apply. Second, @ Com's initial comments dealt with Blue Casa's contention that Virtual CO code based services were "FX." Some of the ILECs, however, contend that the better "analogy" is to 800 service. @ Com will therefore demonstrate that the ILECs' 800 related terms also will not work. They would have to amend their tariffs to cover this traffic for the first time which necessarily means it was never covered and therefore it is and was always subject to § 251(b)(5). As before, @ Com will use NECA FCC Tariff No. 5 for specific language.

@ Com has prepared an attachment that contains the tariff provision cited in these Reply Comments.

I. If this is access then there will be continued controversy and dispute over the application of certain traditional access tariff provisions.

@ Com asserts that access does not apply and has never applied to Virtual CO Code based services by CLECs. But, assuming *arguendo* that access applies there are many access tariff provisions that would also apply; this is far more than just a per-minute "price" issue. @ Com will address a few standard access tariff provisions that would necessarily come in to play as well.

A. Percent Interstate Use.

Virtually every access tariff has terms requiring access customers to submit Percent Interstate Use ("PIU") reports to the LECs providing access service. PIUs serve to jurisidictionalize traffic when there is insufficient call detail, or when the call detail is for some

reason not a reliable indicator of the jurisdiction of a call or group of calls. NECA has PIU terms in § 2.3.11 of FCC Tariff No. 5.

Blue Casa and its supporters are essentially alleging that the calling and called numbers (which are retail rated as "local" to each other) are not reliable indicators of the "true" jurisdiction of the call. Hence most access tariffs would take recourse to the PIU provisions for jurisdictionalization.

Blue Casa seeks a holding that interstate access applies. If they are right then the PIU for Virtual CO code service would be 100%. WITA, Frontier, Embarq and NECA,[3] however, assert that Virtual CO code service is entirely or partially intrastate. These entities appear to be using the ISP's physical location (however it is they fix that location) as one of the end points, with the effect that if the ISP is "physically located" in the same state as the calling party then intrastate access charges apply and if the ISP is "physically located" in a different state then interstate access applies.[4] Therefore, these other ILECs would necessarily claim that the PIU required by the access tariff should be something less than 100% and may in fact be zero.

If this is access traffic then there clearly will be disputes over whether – under the LEC access tariffs – the PIU should be used to jurisidictionalize and if so what PIU should be supplied. One must also wonder why all the ILECs and those few CLECs that say this is access traffic have not been knocking on the door of those LECs that provide Virtual CO Code service demanding that they receive the PIU report that the LECs' access tariff clearly requires.

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[3] WITA, p. 3; Frontier, p. 4; Embarq, pp. 9-10; NECA p. 8.

[4] @ Com disagrees with this argument, and notes that the Commission has consistently held that telecommunications services provided by carriers to ISPs is an interstate service, based on the fact that the ISP offers predominantly interstate enhanced/information service. Those who advocate stopping "at" the ISP are now embracing the "two-call" theory they so ferociously attacked in the Commission decisions that lead to the *ISP Declaratory Ruling* and the *ISP Remand Order*. Nonetheless, it is clear that there is going to be a dispute over what the PIU is or should be for this allegedly access traffic.

Finally, note that NECA's access tariff requires a different mechanism for calculating the PIU for Feature Group D than it does for Feature Group A. *See* § 2.3.11(C)(1)(A) (first and second paragraphs). Blue Casa claims that Virtual CO code based service is "really" "FX." If this is correct then the PIU mechanism for Feature Group A is the one that applies. Other ILECs, however, say that Virtual CO code service is "analogous" to 800 service. If that is true then the PIU mechanism for Feature Group D applies. If the Commission wrongly goes down the access road it will soon have to resolve disputes over which access feature group is the one that will apply for ***all*** purposes – not just the price.

B. Why have they not demanded deposits, and which deposit provisions – the ones in the access tariff or the ones in the interconnection agreements – apply?

NECA FCC Tariff No. 5 has deposit terms in § 2.4.1(A). Under those terms the LEC can demand a deposit if the access customer "does not have established credit." It is highly likely that many of the CLECs that offer Virtual CO code based services do not have established credit with all of the other LECs in an area, particularly many RLECs and all other CLECs, because they have not subscribed to access service as an IXC. In addition, even where a CLEC that provides Virtual CO code based service has some kind of relationship with an LEC, this relationship probably takes the form of a §§ 251/252 interconnection agreement as opposed to an "access tariff" relationship.

If the ILECs are so certain that this is access traffic, why have they not been trying to enforce the deposit terms in the access tariffs? Further, if there is an ICA in place and that ICA has deposit terms, will the tariff deposit provisions or the ICA deposit provisions govern?

C. Which late payment provisions – the ones in the access tariff or the ones in the interconnection agreements – apply?

Section 2.4.1(C)(2) of NECA FCC Tariff No. 5 also has provisions regarding when payment is due and then a requirement that late payments be subject to late payment penalties apply. Blue Casa and other ILECs claim they have sent access bills to Virtual CO code based service providers, but the bills have been disputed. If we assume access does apply, then these past bills would presumably also be incurring late charges. This could materially increase the amounts in dispute, depending on the time it takes to resolve this matter. But – as with deposits – there are likely to be some situations where the two parties have an interconnection agreement in place that also has provisions regarding times to pay and imposing late payment penalties. It is also likely that the provisions differ in time lines and amount.

If this is access traffic will the tariff payment and late payment penalty provisions or the ICA payment and late payment provisions govern?

D. Will the access tariff dispute resolution terms apply, or the different terms in interconnection agreements apply?

NECA FCC Tariff No. 5 also has dispute resolution terms in § 2.4.1(D). There are likely to be some situations where the two parties have an interconnection agreement in place that also has different provisions regarding dispute resolution, including a period of pre-negotiation, escalation and venue, including recourse to the state commission to conduct post-ICA dispute resolution.

If this is access traffic will the tariff dispute resolution provisions or the ICA dispute resolution provisions govern? If the ICA dispute resolution terms control, then does that mean the state commissions – rather than this Commission – will be the forum for § 208 complaints about the terms of the access tariff and particularly the *interstate* access tariff? To the extent that any interstate access rates are deemed to apply, what if the complainant desires to challenge the

level of the charge based on a claim the interstate rate is on its face or as applied unjust, unreasonable, excessive or discriminatory in violation of §§ 201 and 202? Will the state commission handle that too?

E. Where are all those documents required by NECA FCC Tariff No. 5 § 2.4.7?

Blue Casa is a CLEC. Therefore it is likely that calls from Blue Casa end users to ISPs served by other CLECs go through indirect interconnection, and use an ILEC tandem. Therefore, one can fairly reliably assume that there is "more than one" telephone company involved. If they are correct, then there are two LECs providing access service: Blue Casa and the ILEC.

NECA FCC Tariff No. 5 has specific provisions for when there are "Access Services Provided by More Than One Telephone Company." *See* 2.4.7. If – as NECA contends – this is and always was "access" then Blue Casa would be the recording company and Initial Billing Company.

If Blue Casa is right that Virtual CO code service is FX then the applicable access arrangement is Feature Group A. When two LECs jointly provide Feature Group A to an access customer, then under § 2.4.7(a) "Non Meet Point Billing under a Revenue Sharing Agreement is the generally accepted billing method for Feature Group A Switched Access Service. At the agreement of the participating Telephone Companies, Meet Point Billing may apply to jointly provided Feature Group A services as set forth in (B) following."

All the LECs will have to have either a Revenue Sharing Agreement or an agreement to do Meet Point Billing. @ Com trusts that since it raised this issue in the initial comment round the ILECs (and particularly those that provide the equivalent of tandem transport, tandem switching and in some cases the entrance facility) that are directly interconnected to CLECs that provide Virtual CO Code service under interconnection agreements will explain how they have

already implemented the "generally accepted" preference for revenue sharing. In particular, it will be interesting to see how they have implemented § 2.4.7(A)(1).[5]

On the other hand, if this is Feature Group D (and therefore Meet Point Billing) then Blue Casa would "normally" be the Bill Rendering Company when the "preferred" Single Bill Option is used. Have these LECs sent the information called for by 2.4.7(B) to the other LECs in the chain – and specifically the ILEC to whom the CLEC providing Virtual CO code based service likely directly interconnects? Have any of the ILECs that are providing the tandem switching, a portion of the tandem switched transport and the entrance facility sent any of the information they are required to send under 2.4.7(B)?

@ Communications trusts that the ILECs' reply comments will explain how they are handling the situations contemplated by NECA FCC Tariff No. 5 § 2.4.7(B)(1), (2) and (3) as well. Again, it will be particularly interesting to understand how those ILECs that have ICAs and interconnect with CLECs that provide Virtual CO code service and directly interconnect with them are handling the "Single Bill" or "Multiple Bill" provisions. @ Communications strongly suspects these ILECs are <u>not</u> using the tariff but are instead operating under the terms of the ICA.

F. Does the Virtual CO Code CLEC have to directly interconnect with every RLEC's STPs and pay every ILEC's tariffed SS7 related charges in order for SS7 and CPN to work?

NECA filed comments on behalf of "over 1200" ILECs that "choose to participate" in the NECA access tariffs. Presumably many of these ILECs participate in NECA FCC No. 5 as well. NECA argues that Virtual CO code service should be treated like 800 service, for which NECA says on page 4 that Virtual CO Code service is a "substitute." WITA (whose members use

[5] "The telephone company that provides the dial tone will arrange to provide the service, determine the applicable charges and bill the customer for the entire service in accordance with its Access Services tariff as provided for under a Feature Group A Revenue Sharing Agreement."

NECA Tariff FCC No. 5[6]) directly asserts that Virtual CO code service is "more closely analogized" to 800 service on page 6. If this is access traffic, then for those that "choose" to use NECA Tariff FCC No. 5 that tariff must be read to control in all ways all aspects of the service when it comes to any LEC that originates a call to a Virtual CO code. Both the LEC and the access customer is bound by the tariff terms, so none can be "waived" or ignored under § 203(c) of the Act. Let's see what that means and where it leads us.

Since these entities say the proper analogy is to 800 service, and since 800 service is supported through Feature Group D, then their argument necessarily means that all of the tariff descriptions and terms and prices associated with Feature Group D, along with all of the non-chargeable and chargeable options and all other related arrangements, must also comply with the NECA Tariff FCC No. 5 terms without exception.

Most LECs today interconnect with each other using SS7 rather than MF. The signaling and call control is "out of band." Included in the SS7 signaling are certain ISUP IAM parameters such as CPN and CN.[7] These only work when SS7 is implemented. But every LEC does not directly connect to every other LEC's STPs. LECs do it differently today when they interconnect with other LECs than it has "always" been done in the access world as between LECs and IXCs.

While NECA Tariff No. 5 says that "Signaling System 7 (SS7) Signaling," "Calling Party Number" and "Charge Number Parameter" are nonchargeable optional features that are available with Feature Group D, that is ***only*** the case when "a customer subscribes to Common Channel

[6] WITA's Attachment A lists its members. Of those members Hat Island Telephone Company, Hood Canal Communications, Kalama Telephone Company and Tenino Telephone Company (and likely a few others) are listed as "Issuing Carriers" in NECA Tariff FCC No. 5.

[7] NECA has a pending request in Docket 01-92 that all carriers be required to pass CPN or face serious sanctions.

Signaling (SS7) Network Connection Service (CCSNC Service)." *See* §§ 6.1.3(A)(9). And there is a charge for that. *See*, §§ 6.8.2(c)(2)(3), 6.10.1(W), 6.10.1(C) and 17.2.2(A)(1).

So when the ILECs assert that access charges apply to Virtual CO code service and that Feature Group D rates apply, and since they are pressing for a rule requiring carriers to pass CPN and other IAM parameters they are necessarily going to have to say that the Virtual CO code provider must directly interconnect to every ILEC's STP mated pair and obtain and pay for STP Ports and Access Links. The Link is up to $5.28 per mile per termination per month, $52.94 for the mileage termination, per termination per month and a nonrecurring charge of up to $353.00 for the signaling entrance facility, per facility. Then there is the STP Port charge of up to $568.75 per port per month. These charges will apply for every ILEC involved – so it could mean the charges would be assessed for each and every virtual CO code. That can and will get mighty significant pretty quick.

This is not just a quibble over the per minute rate that will apply for intercarrier compensation. One must wonder why those LECs that say access has "always applied" to Virtual CO code traffic have been sending CPN all this time given that their access tariffs expressly provide that SS7 signaling is only available when the access customer subscribes to and pays for access tariff based Common Channel Signaling (SS7) Network Connection Service (CCSNC Service). They are not following the very tariff they insist applies and has always applied. Forfeitures might just be in order for every such ILEC because if they are right that access applies then they are violating § 203(c) since they are not following the tariff.

II. The 800 service analogy fails and gives rise to access tariff issues.

The 800 service analogy is not persuasive. 800 service is a telephone toll service. 800 numbers are nongeographic not only because the SAC does not imply a specific geographic destination and is not itself associated with a particular IXC or LEC switch, but also because it

can be dialed from anywhere and the calling party will still not incur the toll charge. 800 facilitates the shifting of the payment of the toll charge from the calling party to the called party regardless of where either the calling or called party may be and regardless of the rate center association of the calling party.[8]

On the other hand, Virtual CO codes are associated with a specific switch, and they are geographic numbers. The calling party does not incur a toll charge only if the calling party is calling from a number that is associated with a rate center that is "local" to the rate center assignment to which the Virtual CO code is associated. If the calling party is not calling from a number that is "local" to the called number, the calling party must pay a toll. Further, the Virtual CO code customer is not buying a service that revolves around agreeing to pay the toll for the call (instead of the calling party). With Virtual CO codes service there is no toll charge to shift when both parties are using numbers that are "local" to each other. This is not 800 service and it is not analogous to 800 service. It functions differently, it is priced differently and it serves a different purpose.

If the analogy is nonetheless adopted on a theoretical basis, we would then have to turn to the task of finding how the existing access tariffs would be applied to it so that the analogy of Virtual CO code service to 800 service could be operationalized. The ILECs will soon find that the analogy quickly breaks down, and tariff amendments will be required. They have a problem, however: if access tariff changes are necessary to bring Virtual CO code service in then as a matter of law it was not carved out by § 251(g) – meaning, of course, that is it within § 251(b)(5). Blue Casa and the ILECs have the burden of demonstrating just how the access tariffs

[8] *See*, 47 C.F.R. § 52.101(f) ["Toll Free Number. A telephone number for which the toll charges for completed calls are paid by the toll free subscriber. The toll free subscriber's specific geographic location has no bearing on what toll free number it can obtain from the SMS database."]

already completely and exclusively govern this traffic and that no change whatsoever is needed to make it all work.

NECA FCC Tariff No. 5 § 6.1.3(C)(3) provides that:

> 800 Data Base Access Service is provided to all customers in conjunction with FGC and FGD switched access service. When a 1+800 series+NXX-XXXX call is originated by an end user, the Telephone Company will utilize the Signaling System 7 (SS7) network to query an 800 data base[9] to identify the customer to whom the call will be delivered and provide vertical features based on the dialed ten digits. The call will then be routed to the identified customer over FGC or FGD switched access. The 800 series includes the following service access codes: 800, 888, 877, 866, 855, 844, 833 and 822.

Under NECA FCC Tariff No. 5 § 6.1.3(A)(10) two different query levels are available:

> The Basic Query provides the identification of the customer to whom the call will be Query provides the identification of the customer to whom the call will be delivered and includes area of service routing which allows routing of 800 series calls by telephone companies to different interexchange carriers based on the Local Access Transport Area (LATA) in which the call originates. The Vertical Feature Query provides this same customer identification function in addition to vertical features which may include: (1) call validation (ensuring that calls originate from subscribed service areas); (2) POTS translation of 800 series numbers (which is generally necessary for the routing of 800 series calls); (3) alternate POTS translation (which allows subscribers to vary the routing of 800 series calls based on factors such as time of day, place of origination of the call, etc.); and (4) multiple carrier routing (which allows subscribers to route to different carriers based on factors similar to those in (3)).”

We know from the definition of “CIC” in the definitions section of NECA FCC Tariff No. 5 that the query essentially resolves to a CIC; in other words the originating LEC end office will get routing instructions from the database telling it to send the 800 call to a specific IXC and it will then put the bearer portion on an access trunk (whether dedicated or common) that the end office knows will connect to that IXC because its internal instructions associate that trunk as

[9] There is, of course, a charge for the query. *See*, NECA FCC Tariff No. 5 § 17.2.2(B).

being routable to the IXC's CIC. Routing in the access world is CIC based.[10] And, of course, it goes over "access" facilities (whether dedicated or common).

Compare this to routing when two LECs are involved and the number dialed is a regular geographic number that is not a Feature Group A number issued by the open end LEC or a Feature Group B (950-XXXX) or a Feature Group D access code. When Blue Casa's end user dials the Virtual CO code number allocated to the ISP by its competitive carrier, the dial tone office will determine that the number is not associated with the dial tone office, and the switch intelligence will scour one or more databases to determine the LEC that holds the number (including thousands block and LNP) and obtain routing instructions from the LERG. The LEC that holds the number is identified by a "carrier code" but it is an OCN, not a CIC, that is used.[11] The dial tone office begins the process of connecting the call to the tandem or uses a direct trunk. The two end offices will communicate via SS7 and establish a bearer path.

There are some "analogous" functions the originating LEC performs when routing an 800 call and a Virtual CO code based call, although they are done in different ways and different databases are used. Specifically, the originating LEC will dip a database to identify the carrier that holds the geographic number, similar to the way the originating LEC will dip a database to identify the responsible IXC for a nongeographic 800 call. Similarly, the originating LEC will dip a database to determine routing (based on information in the BIRRDS and LERG). If the

[10] CIC "codes are primarily used for routing from the local exchange network to the access purchaser and for billing between the LEC (Local Exchange Carrier) and the access purchaser." ATIS Carrier Identification Code (CIC) Assignment Guidelines, ATIS-0300050 March 14, 2008 Section 1.2, available at www.atis.org/INC/Docs/finaldocs/CIC-Final%20Document-03-14-08revmarked.doc. Note 2 to this document goes on to observe that "[a]lthough LECs are not formal 'purchasers' of FG B or FG D access, these CIC Assignment Guidelines do not preclude LECs from being assigned CICs."

[11] The North American Numbering Plan (NANP) local routing information in the Local Exchange Routing Guide (LERG) and Business Integrated Routing & Rating Database System (BIRRDS) databases map a telephone number prefix to an Operating Company Number (OCN). The OCN is the unique identifier of the LEC or CMRS provider that has received the telephone number prefix.

originating LEC is also the N-1 carrier then it is in addition responsible for dipping the LNP database to determine if the call has been ported, and then find the proper routing based on the LRN that is returned from the LNP database query.

NECA Tariff FCC No. 5 has provisions for the 800 database query, and it also has terms, conditions and process for LNP Query Service. *See* NECA Tariff FCC No. 5, §§ 2.6 (Definitions of "800 Data Base Service," "LNP," "LRN," and "N-1 Carrier"); 6.1.3(A)(10); 6.1.3(C)(3); 6.4.1(C)(8); 6.10.3(D); 13.14.2(A), B); 17.2.2(B); 17.4.4(Q)(1), (2).

One must ask, however: since the LECs are allowed to charge IXCs for the functions the LEC performs – including database dips – won't the ILECs soon start to claim that in addition to the per-minute access charge they say they want from Virtual CO code providers the originating LEC should also recover dipping costs? The problem for them is that while some of the functions an originating LEC performs when routing a call to a Virtual CO Code to another LEC can perhaps be deemed "analogous" to what they do with 800, the existing tariff provisions are quite specific and they cannot be stretched to cover dips to BIRRDS, LERG and LNP databases that occur when an LEC originates a call to a Virtual CO code based service. The "800" terms are explicitly limited to "800 Series" numbers and the LNP Query Service terms only apply when an N-1 carrier forwards a non-queried call to the LEC *for termination*. The tariff would have to be amended to cover this activity for the first time.[12] Further, the LECs would have to convince the Commission that they should recover LNP dip costs even when they are the N-1 carrier, notwithstanding 47 C.F.R. § 52.33(a)(2).

@ Com strongly suspects that if the Commission adopts the theory that Virtual CO code service is "analogous" to 800 service the ILECs will start to ferret out every geographic number

[12] Again, the fact that the activity is not presently covered by current access tariffs necessarily means that it was not carved out of § 251(b)(5) by § 251(g) as a matter of law.

they believe is or may be used for Virtual CO code based service and block the calls unless and until the Virtual CO code provider obtains a CIC and submits an access order for Feature Group D, pays all the nonrecurring charges and then undergoes a complete network reconfiguration to move the traffic from §§ 251/252 based interconnection facilities over to traditional access facilities, with routing through the "access" network rather than the "local" network. Of course, as @ Com noted in its initial comments, Feature Group D does not support calls to a geographic number without the end user dialing a dial-around code, presubscribing to a particular IXC, or dialing an 800 number. The CLEC could order traditional Feature Group A and get a number from the originating LEC, but then a dedicated connection would be required. The CLEC would have to obtain "access" entrance facilities. The CLEC would have to segregate its traffic between what the ILECs say is "local" and can be put on "local" interconnection and the traffic the ILECs say is "access." Those CLECs that wish to continue to provide PSTN connectivity to ISPs will no longer be able to offer Virtual CO code based service, and they will truly be converted into IXCs. Most will simply exit the market because an access-based service cannot compete with flat-rated services offered by the ILECs' captive affiliated ISP operations in non-metropolitan areas.

The ILECs do not merely want Virtual CO code service to pay per minute access charges; their goal is to completely ban it. By doing so they kill three birds. They eliminate intercarrier compensation payments, they accrue additional intercarrier compensation revenue and, perhaps most disturbing, the result will more than likely mean that independent ISPs will not provide service to rural customers. The ILECs' captive affiliated ISP operations will be the only alternative when there is no broadband. Sweet. The ILECs enjoy lower expenses, higher

revenues and less competition from other carriers and independent ISPs. Surely that is not what § 251(g) was intended to do.

CONCLUSION

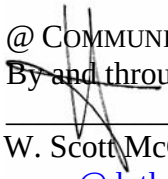
Blue Casa and the ILECs that support the petition are not asking for a declaration that their existing access tariffs apply, for they simply do not. What they are really seeking is a ruling they can use to incorporate terms into §§ 251/252 ICAs that substitute access prices rather than § 251(b)(5) (or more properly § 252(d)(2) cost-based) prices for originating end office switching and common transport. Or they are asking for permission to amend their tariffs to cover this activity for the first time. But this activity was never covered by the access regime before or after 1996, since no Commission-approved access tariff describes this arrangement and provides rates for it.

Those who support imposing access on Virtual CO code services are trying to eliminate one of the few remaining pockets of intra-modal competition that exists, and they also have the strategic goal of imposing daunting economic barriers on the independent ISPs that compete with the ILECs' captive affiliated ISP operations. They want to reduce expense, increase revenue and eliminate competition. That is not exactly what the 1996 amendments were designed to accomplish.

Blue Casa and its ILEC supporters have not carried the burden of proof and cannot ever carry the burden. The facts do not support the petition and the law squarely says no. The policy is just plain wrong.

The petition should be denied.

Respectfully Submitted,



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ACCESS SERVICE

Regulations, Rates and Charges
applying to the provision of Access Services
within a Local Access and Transport Area (LATA) or
equivalent Market Area for connection to interstate
communications facilities for Interstate Customers within
the operating territories of the Issuing Carriers listed
on Title Pages 2 through 68.

All material contained herein is new.

This tariff is filed (1) in compliance with the Federal Communications Commission's Report and Order in CC Docket 86-467, adopted May 14, 1987 and released June 29, 1987 and (2) under the authority of the Commission's Special Permission Nos. 88-192 and 88-200.

The name, title and street address of this tariff's Issuing Officer are located on the bottom of Page 1, the Check Sheet.

Access Services are provided by means of wire, fiber optics, radio or any other suitable technology or a combination thereof.

ACCESS SERVICE

2. General Regulations (Cont'd)

2.3 Obligations of the Customer (Cont'd)

2.3.10 Coordination with Respect to Network Contingencies
The customer shall, in cooperation with the Telephone Company, coordinate in planning the actions to be taken to maintain maximum network capability following natural or man-made disasters which affect telecommunications services.

2.3.11 Jurisdictional Report and Certification Requirements

(A) Certification Requirements - Special Access, Digital Subscriber Line Access and Public Packet Data Network Services

When the customer orders Special Access Service, Digital Subscriber Line Access Service * or Public Packet Data Network Service, and the customer certifies to the Telephone Company in writing that more than ten percent of the traffic is interstate, the service is considered to be interstate and is provided under this Tariff. (C)

Following initial certification, should the jurisdictional nature of the customer's Special Access, Digital Subscriber Line Access or Public Packet Data Network Services change, the customer should inform the Telephone Company in writing of the change. The effective date of the change will be the date the Telephone Company receives the customer's notice of change. No charge applies for the jurisdictional change.

* Digital Subscriber Line Access Service used for connections to the Internet is classified as interstate service provided under this tariff in compliance with the Federal Communications Commission’s Memorandum Opinion and Order released October 30, 1998 (FCC 98-292).

ACCESS SERVICE

2. General Regulations (Cont'd)

2.3 Obligations of the Customer (Cont'd)

2.3.11 Jurisdictional Report and Certification Requirements (Cont'd)

(B) Disputes Involving Jurisdictional Certification - Special Access and Public Packet Data Network

If a dispute arises concerning the certification of projected interstate traffic as described in (A) above, the Telephone Company will ask the customer to provide the data the customer used to determine that more than 10% of the traffic is interstate. The customer shall supply the data within thirty (30) days of the Telephone Company request. If the reply results in a jurisdictional change of a Special Access Service or Public Packet Data Network Service, the effective date of the change will be the date the Telephone Company receives the customer's reply. There is no charge when the customer's reply results in a jurisdictional change in the Special Access or Public Packet Data Network Service.

(C) Jurisdictional Reports - Switched Access

For Switched Access Service, the Telephone Company cannot in all cases determine the jurisdictional nature of customer traffic and its related access minutes. In such cases the customer may be called upon to provide a projected estimate of its traffic, split between the interstate and intrastate jurisdictions. For purposes of determining the jurisdiction of Switched Access Services, the regulations set forth in (1) through (4), below, apply. (C) (C) (D) (D)

2. General Regulations (Cont'd)

2.3 Obligations of the Customer (Cont'd)

2.3.11 Jurisdictional Report and Certification Requirements (Cont'd)

(C) Jurisdictional Reports - Switched Access (Cont'd)

(1) Percentage of Interstate Use (PIU)

(a) For purposes of developing the projected interstate percentage for Feature Group C or Feature Group D, the customer shall consider every call that originates from a calling party in one state and terminates to a called party in a different state to be interstate communications. The customer shall consider every call that terminates to a called party within the same state as the state where the calling party is located to be intrastate communications. The manner in which a call is routed through the telecommunications network does not affect the jurisdiction of a call, i.e., a call between two points within the same state is an intrastate call even if it is routed through another state. (N)

For purposes of developing the (C)
projected interstate percentage for
Feature Group A or Feature Group B, (C)
pursuant to Federal Communications (T)
Commission Order FCC 85-145 released (M)
April 16, 1985, interstate usage is
to be developed as though every call
that enters a customer network at a
point within the same state as that
in which the called station (as
designated by the called station
telephone number) is situated is an
intrastate communication and every
call for which the point of entry is
a state other than that where the
called station (as designated by the
called station telephone number) is
situated, is an interstate
communication. (M)

Certain material currently found on this page formerly appeared on 9th Revised Page 2-20.

2. General Regulations (Cont'd)

2.3 Obligations of the Customer (Cont'd)

2.3.11 Jurisdictional Report and Certification Requirements (Cont'd)

(C) Jurisdictional Reports - Switched Access (Cont'd)

(1) Percentage of Interstate Use (PIU) (Cont'd) (N)

(b) When the Telephone Company receives sufficient call detail to permit it to determine the jurisdiction of some or all originating and terminating access minutes of use, the Telephone Company will use that call detail to render bills for those minutes of use and will not use PIU factors(s) described in (2), below, to determine the jurisdiction of those minutes of use. (C)

When the Telephone Company receives insufficient call detail to determine the jurisdiction of some or all originating and terminating access minutes of use, the Telephone Company will apply the PIU factor(s) provided by the customer or developed by the Telephone Company as set forth in (2), below, only to those minutes of use for which the Telephone Company does not have sufficient call detail. Such PIU factor(s) will be used until the customer provides an update to its PIU factor(s) as set forth in (2) (g) or (h), below.

For all flat rated Switched Access Services, the Telephone Company will apply the PIU factor(s) as provided by the customer or developed by the Telephone Company as set forth in (2), below, each month until the customer provides an update to its PIU factor(s) as described in (2) (g) or (h), below. (C)

ACCESS SERVICE

2. General Regulations (Cont'd)

2.3 Obligations of the Customer (Cont'd)

2.3.11 Jurisdictional Report and Certification Requirements (Cont'd)

(C) Jurisdictional Reports - Switched Access (Cont'd)

(2) Use of PIU Factors

(a) As specified in Section 5.2.1, following, the customer will provide a projected PIU for each Switched Access Service for each end office when placing its order. Such PIU factors are applied to all usage rated elements (including but not limited to Information Surcharge, Local Switching, and Tandem Switched Transport), where the Telephone Company does not receive sufficient call detail to determine the jurisdiction of the usage. (C)

If the customer fails to provide a PIU factor on its order for service, the following provisions apply. For originating access minutes, when the call detail is adequate to determine the appropriate jurisdiction and when the Feature Group C or Feature Group D access minutes of use are measured, the Telephone Company will develop PIU factor(s) on a monthly basis by end office by dividing the customer's measured interstate originating access minutes (the access minutes where the calling party is in one state and the called party is in another state) by the customer's total originating access minutes. For terminating access minutes, the same data used by the Telephone Company to develop the PIU factor for originating access minutes will be used to develop the PIU factor for such terminating access minutes.

ACCESS SERVICE (N)

2. General Regulations (Cont'd)

2.3 Obligations of the Customer (Cont'd)

2.3.11 Jurisdictional Report and Certification Requirements (Cont'd)

(C) Jurisdictional Reports - Switched Access (Cont'd)

(2) Use of PIU Factors (Cont'd) (N)

The Telephone Company developed PIU factor(s) described in this section will only be used for minutes of use for which the Telephone Company does not have sufficient call detail to determine the jurisdiction until such time as the customer provides updated PIU factor(s) for these services. (C)

(b) Separate PIUs are required for flat rated Entrance Facilities, Direct Trunked Transport Facilities, and Switched Access Services Optional Features and Functions. The PIU factor(s) for use with such flat rated elements will reflect the combination of originating and terminating traffic of all services using such facilities. (M) (M) (C) (C)

If the customer fails to provide a PIU factor on its order for service, the Telephone Company will apply the PIU factor it developed pursuant to (2)(a), above, against the customer's flat rated Switched Access Services to apportion those changes between the jurisdictions. (N)

Certain material currently found on this page formerly appeared on 9th Revised Page 2-20.

ACCESS SERVICE

2. General Regulations (Cont'd)

2.3 Obligations of the Customer (Cont'd)

2.3.11 Jurisdictional Report and Certification Requirements (Cont'd) (N)

(C) Jurisdictional Reports - Switched Access (Cont'd)

(2) Use of PIU Factors (Cont'd) (T)

(c) When a customer orders Feature Group A or Feature Group B Switched Access Service, the customer shall, in its order, state the projected percentage for interstate usage for each Feature Group A or Feature Group B Switched Access Service group ordered. The term group shall be construed to mean single lines or trunks as well. For all groups the number of access minutes (either measured or assumed) for a group will be multiplied by the projected interstate percentage to develop the interstate access minutes. The number of access minutes for the group minus the developed interstate access minutes for the group will be developed intrastate access minutes. (T) (M) (M)

(d) When a customer orders Directory Assistance Service, the customer shall, in its order, provide the projected interstate percentage for terminating use. (T) (M) (M) (C)

(e) When the customer has both interstate and intrastate Operator Services traffic, the percentage interstate usage determined for the customers's FGC or FGD service will be applied to the customer's Operator Services charges. (T) (M) (M)

Certain material currently found on this page formerly appeared on 4th Revised Page 2-21 and 5th Revised Page 2-24.

Certain material formerly found on this page now appears on Original Page 2-18.2, 6th Revised Page 2-19, Original Page 2-19.1 and Original Page 2-21.1.

ACCESS SERVICE

2. General Regulations (Cont'd)

2.3 Obligations of the Customer (Cont'd)

2.3.11 Jurisdictional Report and Certification Requirements (Cont'd) (T)

(C) Jurisdictional Reports - Switched Access (Cont'd)

(2) Use of PIU Factors (Cont'd) (T)

(f) For each service, the customer may only provide a PIU factor that is in a whole number format, i.e., a number from 0 to 100. When the customer provides the PIU factor, the Telephone Company will subtract the provided PIU from 100 and the difference is the percent intrastate usage. The sum of the interstate and intrastate percentages will equal 100 percent. The customer provided factors will be used by the Telephone Company as described in (1)(b), above, until the customer provides updated PIU factors as required in (2)(g) or (h), below. (N)

(g) When the customer adds or discontinues Busy Hour Minutes of Capacity (BHMC), lines or trunks to an existing Switched Access Service group, the customer shall furnish a revised projected interstate percentage for the remaining BHMC, lines or trunks in the end office group. The revised report will serve as the basis for future billing, where applicable, and will be effective on the next bill date. No prorating or back billing will be done based on such revised report. (C)

Certain material currently found on this page formerly appeared on 5th Revised Page 2-19 and 9th Revised Page 2-20.

Certain material formerly found on this page now appears on 10th Revised Page 2-20.

ACCESS SERVICE (N)

2. General Regulations (Cont'd)

2.3 Obligations of the Customer (Cont'd)

2.3.11 Jurisdictional Report and Certification Requirements (Cont'd)

(C) Jurisdictional Reports - Switched Access (Cont'd)

(2) Use of PIU Factors (Cont'd) (N)

(h) Effective on the first of January, (T)
April, July and October of each year, (M)
the customer shall update its interstate (C)
and intrastate jurisdictional report. (M)
The customer shall forward to the
Telephone Company, to be received no
later than fifteen (15) days after the
first of each such month, a revised
report showing the interstate and
intrastate percentage of use for the
past three months ending the last day of
December, March, June and September,
respectively, for each service arranged (M)
for interstate use. Such revised report (C)
will serve as the basis for the next (M)
three month's billing for determining (C)
the jurisdiction for Switched Access
Services in cases where the Telephone
Company does not have sufficient call
detail to do so and will be effective on (C)
the bill date for that service. No (M)
prorating or back billing will be done (M)
based on the revised report. (C)

If the customer does not supply the (M)
revised reports, the Telephone Company (C)
will assume the percentages to be the (M)
same as those provided in the last
quarterly report. For those cases in
which a quarterly report has never been
received from the customer, the
Telephone Company will assume the
percentages to be the same as those
provided in the customer's order for (M)
service or as developed by the Telephone (C)
Company as specified in (2)(a), above. (C)

Certain material currently found on this page formerly appeared on 5th Revised Page 2-19 and 9th Revised Page 2-20.

ACCESS SERVICE

2. General Regulations (Cont'd)

2.3 Obligations of the Customer (Cont'd)

2.3.11 Jurisdictional Report and Certification Requirements (Cont'd) (T)

(C) Jurisdictional Reports - Switched Access (Cont'd)

(3) Maintenance of Customer Records (T)

(a) The customer shall retain for a minimum of six (6) months call detail records that substantiate the interstate percent provided to the Telephone Company as set forth in (2), above, for Switched Access Services. Such records shall consist of (i) and (ii), below, if applicable. (N)

(i) All call detail records such as work papers and/or backup documentation including paper, magnetic tapes or any other form of records for billed customer traffic, call information including call terminating address (i.e., called number), the call duration, all originating and terminating trunk groups or access lines over which the call is routed, and the point at which the call enters the customer's network and;

(ii) If the customer has a mechanized system in place that calculated the PIU, then a description of that system and the methodology used to calculate the PIU must be furnished and any other pertinent information (such as but not limited to flowcharts, source code, etc.) relating to such system must also be made available. (N)

Certain material formerly found on this page now appears on 6th Revised Page 2-19.

ACCESS SERVICE

2. General Regulations (Cont'd)

2.3 Obligations of the Customer (Cont'd)

2.3.11 Jurisdictional Report and Certification Requirements (Cont'd) (T)

(C) Jurisdictional Reports - Switched Access (Cont'd)

Certain material formerly found on this page now appears on 6th Revised Page 2-19 and 10th Revised Page 2-20.

ACCESS SERVICE

2. General Regulations (Cont'd)

2.3 Obligations of the Customer (Cont'd)

2.3.11 Jurisdictional Report and Certification Requirements (Cont'd) (T)

(C) Jurisdictional Reports - Switched Access (Cont'd)

(4) Disputes Involving Jurisdictional Reports – Switched Access (T) (T)

(a) If a billing dispute arises or if a regulatory commission questions the projected PIU factor(s) provided by the customer, the Telephone Company may, by written request, require the customer to provide the data the customer used to determine the projected PIU factor(s). This written request will be considered the initiation of the audit. The customer shall supply the data to an independent auditor or the Telephone Company within thirty (30) days of the Telephone Company request. The customer shall keep records of call detail from which the percentage of interstate and intrastate use can be ascertained as set forth in (3), above, and upon request of the Telephone Company make the records available for inspection at an agreed upon location during normal business hours as reasonably necessary for purposes of verification of the percentages. The Telephone Company will audit data from one quarter unless a longer period is requested by the customer and agreed to by the Telephone Company. (C) (C)

Certain material formerly found on this page now appears on 10th Revised Page 2-20 and Original Page 2-24.1.

ACCESS SERVICE (N)

2. General Regulations (Cont'd)

2.3 Obligations of the Customer (Cont'd)

2.3.11 Jurisdictional Report and Certification Requirements (Cont'd)

(C) Jurisdictional Reports - Switched Access (Cont'd)

(4) Disputes Involving Jurisdictional Reports – Switched Access (Cont'd)

(b) If the customer does not provide the requested data to the Telephone Company or independent auditor within thirty (30) days of the notice of audit, the customer will be in violation of the Tariff and subject to the provisions specified in Section 2.1.8(A), preceding.

(c) Audits may be conducted by: (1) the Telephone Company when the customer agrees; (2) an independent auditor under contract to the Telephone Company; (3) a mutually agreed upon independent auditor paid for equally by the customer and the Telephone Company; or (4) an independent auditor selected and paid for by the customer. If the customer selects option (4), where it pays for its own independent audit, the selected auditor must certify that the audit was performed following Commission procedures for measuring interstate traffic as established by Commission Order, and provide the Telephone Company a report with supporting documentation to verify such procedures. (N)

(d) Verification audits may be conducted no more frequently than once per year except in extreme circumstances. The Telephone Company and customer will attempt to limit the audit to a reasonable time to effectively complete the audit. The Telephone Company and customer shall respond promptly to requests generated during the audit to ensure timely completion of the audit. (C) (C) (N) (N)

Certain material currently found on this page formerly appeared on 5th Revised Page 2-24.

2. General Regulations (Cont'd)

2.3 Obligations of the Customer (Cont'd)

2.3.11 Jurisdictional Report and Certification Requirements (Cont'd)

(C) Jurisdictional Reports - Switched Access (Cont'd)

(4) Disputes Involving Jurisdictional Reports – Switched Access (Cont'd)

(e) When a PIU audit is conducted by the Telephone Company or an independent auditor under contract to the Telephone Company, the audit results will be furnished to the customer by Certified U.S. Mail. When a PIU audit is conducted by an independent auditor selected by the customer, the audit results will be furnished to the Telephone Company by Certified U.S. Mail. The Telephone Company will adjust the customer's PIU based upon the audit results. The PIU resulting from the audit shall be applied to the customer's usage for the quarter the audit is completed, the usage for the quarter prior to the completion of the audit, and the usage for the two (2) quarters following the completion of the audit. After that time, the customer may report revised PIU pursuant to (2)(g) or (h), above. If the revised PIU submitted by the customer represents a deviation of 5 percentages points or more from the audited PIU, and that deviation is not due to identifiable reasons, the provisions in (4)(a), above, may be applied.

(f) Both credit and debit adjustments will be made to the customer's interstate access charges based on the audit results for the specified periods to accurately reflect the interstate usage for the customer's account consistent with Section 2.4.1, following. (N)

2. General Regulations (Cont'd)

2.3 Obligations of the Customer (Cont'd)

2.3.11 Jurisdictional Report and Certification Requirements (Cont'd)

(C) Jurisdictional Reports - Switched Access (Cont'd)

(4) Disputes Involving Jurisdictional Reports – Switched Access (Cont'd)

(g) If, as a result of an audit conducted by an independent auditor, a customer is found to have over-stated its PIU(s) by 20 percentage points or more, the Telephone Company shall require reimbursement from the customer for the cost of the audit. Such bill(s) shall be due and paid in immediately available funds within 30 days from receipt and shall carry a late payment penalty as set forth in Section 2.4.1, following, if not paid within the 30 days. (N)

ACCESS SERVICE

2. General Regulations (Cont'd)

2.3 Obligations of the Customer (Cont'd)

2.3.12 Determination of Interstate Charges for Mixed Interstate and Intrastate Switched Access Service

When mixed interstate and intrastate Switched Access Service is provided, all charges (i.e., nonrecurring, monthly and/or usage) including optional features charges, will be prorated between interstate and intrastate. The PIU factor(s) provided by the customer or developed by the Telephone Company as set forth in Section 2.3.11(C)(2), preceding, will serve as the basis for prorating the charges unless the Telephone Company is billing according to sufficient call details as set forth in Section 2.3.11(C)(1)(b), preceding. The percentage of a Switched Access Service to be charged as interstate is applied in the following manner: (C) (C) (C) (C)

(A) Monthly and Nonrecurring Charges

For monthly and nonrecurring chargeable rate elements, multiply the percent interstate use times the quantity of chargeable elements times the stated tariff rate per element. (C)

(B) Usage Sensitive Charges

For usage sensitive (i.e., access minutes and calls) chargeable rate elements, multiply the percent interstate use times actual use (i.e., measured or Telephone Company assumed average use) times the stated tariff rate.

(D)
(D)

ACCESS SERVICE

2. General Regulations (Cont'd)

2.4 Payment Arrangements and Credit Allowances

2.4.1 Payment of Rates, Charges and Deposits

(A) Deposits

The Telephone Company will only require a customer that has a proven history of late payments to the Telephone Company or that does not have established credit to make a deposit as a guarantee of the payment of rates and charges. Such deposit may be required prior to establishing a service or at any time after the provision of a service to the customer. For purposes of this section, a proven history of late payments is defined as two (2) or more occasions within the preceding twelve (12) months in which payment for undisputed charges was not received within three (3) business days following the payment due date, provided the outstanding undisputed amount of each such individual unpaid bill represented at least ten (10) percent of the total charges on that individual bill. The Telephone Company will provide notice via overnight delivery to the person designated by the customer to receive such notice of the requirement to pay a deposit. The customer will be required to make payment of such deposit prior to the provision of service in those cases where the customer has not established credit with the Telephone Company, or otherwise within fifteen (15) business days of such notice. Such notice period will start the day after the notice is sent by overnight delivery.

No such deposit will be required of a customer which is a successor of a company which has established credit and has no history of late payments to the Telephone Company. For new services(s) being established such deposit will not exceed the

Certain material formerly found on this page now appears on 6th Revised Page 2-26.1.

ACCESS SERVICE

2. General Regulations (Cont'd)

2.4 Payment Arrangements and Credit Allowances (Cont'd)

2.4.1 Payment of Rates, Charges and Deposits (Cont'd)

(A) Deposits (Cont'd)

estimated rates and charges for a two-month period. For existing service(s) such deposit will not exceed the actual rates and charges for a two-month period associated with each individual bill that met the criteria for late payments specified above. The fact that a deposit has been made in no way relieves the customer from complying with the Telephone Company's regulations as to the prompt payment of bills. At such time as the provision of the service to the customer is terminated, the amount of the deposit will be credited to the customer's account and any credit balance which may remain will be refunded. (M) (M)

Such a deposit will be refunded or credited to the account when the customer has established credit or, in any event, after the customer has established a one-year prompt payment record at any time prior to the termination of the provision of the service to the customer. In case of a cash deposit, for the period the deposit is held by the Telephone Company, the customer will receive interest at the same percentage rate as that set forth in (C)(2)(a) or in (C)(2)(b), following, whichever is lower.

The rate will be compounded daily for the number of days from the date the customer deposit is received by the Telephone Company to and including the date such deposit is credited to the customer's account or the date the deposit is refunded by the Telephone Company. Should a deposit be credited to the customer's account, as indicated above, no interest will accrue on the deposit from the date such deposit is credited to the customer's account.

Certain material currently found on this page previously appeared on 8th Revised Page 2-26.

ACCESS SERVICE

2. General Regulations (Cont'd)

2.4 Payment Arrangements and Credit Allowances (Cont'd)

2.4.1 Payment of Rates, Charges and Deposits (Cont'd)

(A) Deposits (Cont'd)

(D)(x)

(D)(x)

Certain material formerly found on this page can now be found on 6th Revised Page 2-26.

(x) Filed under authority of Special Permission No. 03-004 of the Federal Communications Commission to reinstate currently effective regulations and to withdraw revisions filed under Transmittal No. 951 before becoming effective.

ACCESS SERVICE

2. General Regulations (Cont'd)

2.4 Payment Arrangements and Credit Allowances (Cont'd)

2.4.1 Payment of Rates, Charges and Deposits (Cont'd)

(A) Deposits (Cont'd)

(D)(x)

(D)(x)

Certain material formerly found on this page can now be found on 6th Revised Page 2-26.

(x) Filed under authority of Special Permission No. 03-004 of the Federal Communications Commission to reinstate currently effective regulations and to withdraw revisions filed under Transmittal No. 951 before becoming effective.

ACCESS SERVICE

2. General Regulations (Cont'd)

2.4 Payment Arrangements and Credit Allowances (Cont'd)

2.4.1 Payment of Rates, Charges and Deposits (Cont'd)

(B) Bill Dates (T)

The Telephone Company shall bill on a current basis all charges incurred by and credits due to the customer under this tariff attributable to services established or discontinued during the preceding billing period. In addition, the Telephone Company shall bill in advance charges for all services to be provided during the ensuing billing period except for charges associated with service usage and for the Federal Government which will be billed in arrears. The bill day (i.e., the billing date of a bill for a customer for service under this tariff), the period of service each bill covers and the payment date will be as follows: (M) (M)

Certain material currently found on this page previously appeared on 7th Revised Page 2-27.

ACCESS SERVICE

2. General Regulations (Cont'd)

2.4 Payment Arrangements and Credit Allowances (Cont'd)

2.4.1 Payment of Rates, Charges and Deposits (Cont'd)

(B) Bill Dates (Cont'd) (T)

(1) End User Access Service, Federal Universal Service Charge, ISDN Line Ports, DS1 Line Port, Digital Subscriber Line Access Service and Presubscription

For End User Access Service, Federal Universal Service Charge, ISDN Line Ports, DS1 Line Port, Digital Subscriber Line Access Service and Presubscription Service, the Telephone Company will establish a bill day each month for each end user account or advise the customer in writing of an alternate billing schedule. Alternate billing schedules shall not be established on less than 60 days notice or initiated by the Telephone Company more than twice in any consecutive 12 month period. The bill will cover End User Access Service, Federal Universal Service Charge, ISDN Line Ports, DS1 Line Port, and Digital Subscriber Line Access Service charges for the ensuing billing period except for End User Access Service, Federal Universal Service Charge, ISDN Line Ports, DS1 Line Port, and Digital Subscriber Line Access Service for the Federal Government which will be billed in arrears. Any applicable PIC Change Charges, any known unbilled charges for prior periods and any known unbilled adjustments for prior periods for End User Access Service, Federal Universal Service Charge, ISDN Line Ports, DS1 Line Port, Digital Subscriber Line Access Service and Presubscription Service will be applied to this bill. Such bills are due when rendered.

Certain material formerly found on this page now appears on 2nd Revised Page 2-26.4.

ACCESS SERVICE

2. General Regulations (Cont'd)

2.4 Payment Arrangements and Credit Allowances (Cont'd)

2.4.1 Payment of Rates, Charges and Deposits (Cont'd)

(B) Bill Dates (Cont'd)

(2) Services Other Than End User, Federal Universal Service Charge, ISDN Line Ports, DS1 Line Port, Digital Subscriber Line and Presubscription (T)

For Services other than End User Access Service, Federal Universal Service Charge, ISDN Line Ports, DS1 Line Port, Digital Subscriber Line Access Service and Presubscription Service the Telephone Company will establish a bill day each month for each customer account or advise the customer in writing of an alternate billing schedule. Alternate billing schedules shall not be established on less than 60 days notice or initiated by the Telephone Company more than twice in any consecutive 12 month period. (C)

The bill will cover nonusage sensitive service charges for the ensuing billing period for which the bill is rendered, any known unbilled nonusage sensitive charges for prior periods and unbilled usage charges for the period after the last bill day through the current bill day. Any known unbilled usage charges for prior periods and any known unbilled adjustments will be applied to this bill. Payment for such bills is due in immediately available funds by the payment date, as set forth in (C) following. If payment is not received by the payment date, a late payment penalty will apply as set forth in (C) following.

ACCESS SERVICE

2. General Regulations(Cont'd)

2.4 Payment Arrangements and Credit Allowances (Cont'd)

2.4.1 Payment of Rates, Charges and Deposits (Cont'd)

(C) Payment Dates and Late Payment Penalties

(1) All bills dated as set forth in (B)(2) preceding for service, other than End User Service, Federal Universal Service Charge, ISDN Line Ports, DS1 Line Port, Digital Subscriber Line Access Service and Presubscription Service provided to the customer by the Telephone Company are due 31 days (payment date) after the bill day or by the next bill date (i.e., same date in the following month as the bill date), whichever is the shortest interval, except as provided herein, and are payable in immediately available funds. If the customer does not receive a bill at least 20 days prior to the 31 day payment due date, then the bill shall be considered delayed. When the bill has been delayed, upon request of the customer the due date will be extended by the number of days the bill was delayed. Such request of the customer must be accompanied with proof of late bill receipt. (C)

ACCESS SERVICE

2. General Regulations (Cont'd)

2.4 Payment Arrangements and Credit Allowances (Cont'd)

2.4.1 Payment of Rates, Charges and Deposits (Cont'd)

(C) Payment Dates and Late Payment Penalties (Cont'd)

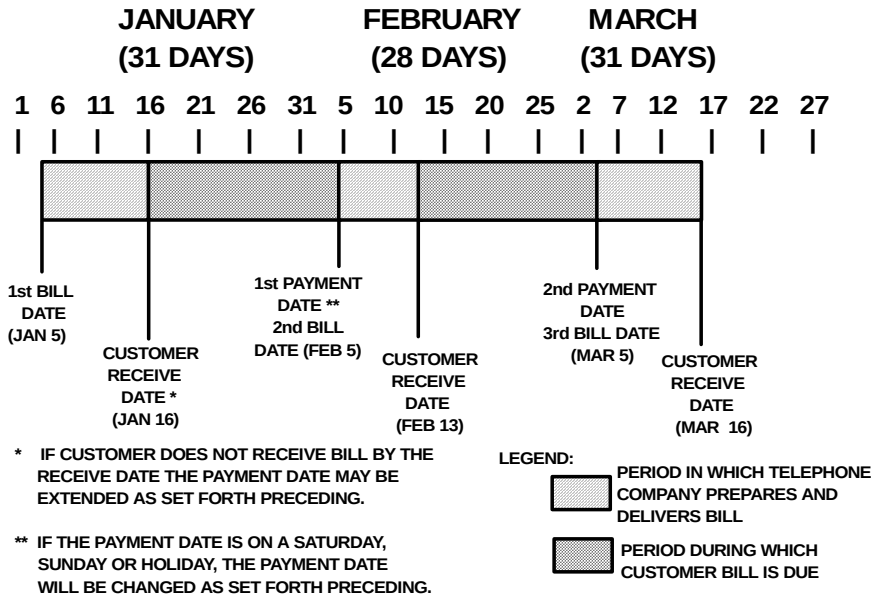
(1) (Cont'd)

If such payment date would cause payment to be due on a Saturday, Sunday or Legal Holiday, payment for such bills will be due from the customer as follows:

- If the payment date falls on a Sunday or on a Legal Holiday which is observed on a Monday, the payment date shall be the first non-Holiday day following such Sunday or Legal Holiday.

- If the payment date falls on a Saturday or on a Legal Holiday which is observed on Tuesday, Wednesday, Thursday or Friday, the payment date shall be the last non-Holiday day preceding such Saturday or Legal Holiday.

EXAMPLE: CALCULATION OF PAYMENT DATES



x) Issued to reflect new corporate address.

ACCESS SERVICE

2. General Regulations (Cont'd)

2.4 Payment Arrangements and Credit Allowances (Cont'd)

2.4.1 Payment of Rates, Charges and Deposits (Cont'd)

(C) Payment Dates and Late Payment Penalties (Cont'd)

(2) Further, if no payment is received by the payment date or if a payment or any portion of a payment is received by the Telephone Company after the payment date as set forth in (1) preceding, or if a payment or any portion of a payment is received by the Telephone Company in funds which are not immediately available to the Telephone Company, then a late payment penalty shall be due to the Telephone Company. The late payment penalty shall be the payment or the portion of the payment not received by the payment date times a late factor. The late factor shall be the lesser of:

(a) the highest interest rate (in decimal value) which may be levied by law for commercial transactions, compounded daily for the number of days from the payment date to and including the date that the customer actually makes the payment to the Telephone Company, or

(b) 0.000292 per day, compounded daily for the number of days from the payment date to and including the date that the customer actually makes the payment to the Telephone Company.

Certain material formerly found on this page can now be found on Original Page 2-31.1 and Original Page 2-31.2.

ACCESS SERVICE (N)

2. General Regulations (Cont'd)

2.4 Payment Arrangements and Credit Allowances (Cont'd)

2.4.1 Payment of Rates, Charges and Deposits (Cont'd) (N)

(D) Billing Disputes (T)(M)

(1) A good faith dispute requires the customer to provide a written claim to the Telephone Company. Instructions for submitting a dispute can be obtained by calling the billing inquiry number shown on the customer's bill, or, when available, by accessing such information on the Telephone Company's website also shown on the customer's bill. Such claim must identify in detail the basis for the dispute, and if the customer withholds the disputed amounts, it must identify the account number under which the bill has been rendered, the date of the bill, and the specific items on the bill being disputed to permit the Telephone Company to investigate the merits of the dispute. (N)

(2) The date of the dispute shall be the date on which the customer furnishes the Telephone Company the account information required in (D)(1), above.

(3) The date of resolution is the date the Telephone Company completes its investigation, provides written notice to the customer regarding the disposition of the claim, i.e., resolved in favor of the customer or resolved in favor of the Telephone Company, and credits the customer's account, if applicable. (N)

Certain material currently found on this page formerly appeared on 2nd Revised Page 2-31.

ACCESS SERVICE (N)

2. General Regulations (Cont'd)

2.4 Payment Arrangements and Credit Allowances (Cont'd)

2.4.1(D) Billing Disputes (Cont'd) (N)

(4) In the event that a billing dispute concerning any charges billed to the customer by the Telephone Company is resolved in favor of the Telephone Company, any payments withheld pending settlement of the dispute shall be subject to the late payment penalty set forth in (C)(2), above. (C)(M)

(5) If the customer pays the bill in full by the payment due date, and later initiates a billing dispute within ninety (90) days of the payment due date, penalty interest may be applicable.

(a) If the billing dispute is resolved in favor of the customer, the customer shall receive a credit from the Telephone Company. This credit will be an amount equal to the disputed amount resolved in the customer's favor times a penalty factor. This amount will apply from the date of the customer's payment through the date on which the customer receives the disputed amount credit from the Telephone Company. The penalty factor shall be the lesser of: (C)(M)

(i) the highest interest rate (in decimal value) which may be levied by law for commercial transactions, compounded daily for the number of days from the first date to and including the last date of the period involved, or (T)(M)

(ii) 0.000292 per day, compounded daily for the number of days from the first date to and including the last date of the period involved. (T) (M)

Certain material currently found on this page formerly appeared on 2nd Revised Page 2-31 and 3rd Revised Page 2-32.

ACCESS SERVICE

2. General Regulations (Cont'd)

2.4 Payment Arrangements and Credit Allowances (Cont'd)

2.4.1(D) Billing Disputes (Cont'd) (T)

(b) If the dispute is resolved in favor of the Telephone Company, neither a late payment charge nor a penalty interest charge is applicable. (C)

(6) If the customer pays the bill in full by the payment due date, and later initiates a billing dispute after (90) days of the payment due date, penalty interest may be applicable.

(a) If the billing dispute is resolved in favor of the customer, the customer shall receive a credit from the Telephone Company. This credit will be an amount equal to the disputed amount resolved in the customer's favor times a penalty factor. This amount will apply from the date of the dispute through the date on which the customer receives the disputed amount credit from the Telephone Company. The penalty factor shall be the lesser of: (C)

(i) the highest interest rate (in decimal value) which may be levied by law for commercial transactions, compounded daily for the number of days from the first date to and including the last date of the period involved, or (T)

(ii) 0.000292 per day, compounded daily for the number of days from the first date to and including the last date of the period involved. (T)

(b) If the dispute is resolved in favor of the Telephone Company, neither a late payment charge nor a penalty interest charge is applicable.

Certain material formerly found on this page can now be found on Original Page 2-31.2 and Original Page 2-32.1.

ACCESS SERVICE (N)

2. General Regulations (Cont'd)

2.4 Payment Arrangements and Credit Allowances (Cont'd)

2.4.1 Payment of Rates, Charges and Deposits (Cont'd) (N)

(E) Proration of Charges (T)(M)

Adjustments for the quantities of services established or discontinued in any billing period beyond the minimum period set forth for services in other sections of this tariff will be prorated to the number of days based on a 30 day month. The Telephone Company will, upon request, furnish within 30 days of a request and at no charge to the customer such detailed information as may reasonably be required for verification of any bill. (M)

Certain material currently found on this page formerly appeared on 3rd Revised Page 2-32.

ACCESS SERVICE

2. General Regulations (Cont'd)

2.4 Payment Arrangements and Credit Allowances (Cont'd)

2.4.5 Re-establishment of Service Following Fire, Flood or Other Occurrence (Cont'd)

(B) Nonrecurring Charges Apply

Nonrecurring Charges apply for establishing service at a different location on the same premises or at a different premises pending re-establishment of service at the original location.

2.4.6 Title or Ownership Rights

The payment of rates and charges by customers for the services offered under the provisions of this tariff does not assign, confer or transfer title or ownership rights to proposals or facilities developed or utilized, respectively, by the Telephone Company in the provision of such services.

2.4.7 Access Services Provided By More Than One Telephone Company

When an Access Service is provided by more than one Telephone Company, the Telephone Companies involved will mutually agree upon one of the billing methods as set forth in (B) (1) and (2) following based on the service being provided. The Telephone Companies will notify the customer in writing of the billing method being used. The customer will place the order for the service as set forth in 5.3 following dependent upon the billing method.

(A) Non Meet Point Billing/Feature Group A

Non Meet Point Billing under a Revenue Sharing Agreement is the generally accepted billing method for Feature Group A Switched Access Service. At the agreement of the participating Telephone Companies, Meet Point Billing may apply to jointly provided Feature Group A services as set forth in (B) following.

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ACCESS SERVICE

2. General Regulations (Cont'd)

2.4 Payment Arrangements and Credit Allowances (Cont'd)

2.4.7 Access Services Provided by More Than One Telephone Company

(A) Non Meet Point Billing/Feature Group A (Cont'd)

(1) Single Company Billing/Revenue Sharing

All Telephone Companies jointly providing Feature Group A service will receive an order or a copy of the order, from the customer, as specified in 5.3.1(A) following. The telephone company that provides the dial tone will arrange to provide the service, determine the applicable charges and bill the customer for the entire service in accordance with its Access Services tariff as provided for under a Feature Group A Revenue Sharing Agreement.

(B) Meet Point Billing

Meet Point Billing is required when an access service is provided by multiple Telephone Companies for Feature Groups B, C, and D Switched Access Services, Directory Assistance and Special Access. It is optional for Feature Group A Switched Access Service.

Each Telephone Company jointly providing the access service will receive an order or a copy of the order from the customer as specified in 5.3.2 following and arrange to provide the service.

For usage rated access services the access minutes of use will generally be determined by the recording company. Where the recording company is not the Bill Rendering Company, the recording company will provide detailed usage records to the Bill Rendering Company to develop the access minutes.

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ACCESS SERVICE

2. General Regulations (Cont'd)

2.4 Payment Arrangements and Credit Allowances (Cont'd)

2.4.7 Access Services Provided by More Than One Telephone Company (Cont'd)

(B) Meet Point Billing (Cont'd)

The Bill Rendering Company in a single bill arrangement for Feature Groups B, C, and D Switched Access Services, is normally the end user's end office, for WATS usage the Bill Rendering Company is normally the WATS Serving Office, for Directory Assistance, the Bill Rendering Company is normally the Directory Assistance location. The name of the Bill Rendering Company will be included in the meet point billing notification provided to the customer by all the telephone companies on all meet point billed services.

The non Bill Rendering Company(s) is any Telephone Company(s) in whose territory a segment of the Local Transport or Channel Mileage is provided and/or where the customer's Point of Termination is located.

There are two Meet Point Billing Options, Single Bill and Multiple Bill. These billing options are explained in (1) and (2) following. The Single Bill option is the preferred method. However, when a single bill option can not be agreed to by all telephone companies providing service, the multiple bill option is the default.

Each telephone company must provide meet point billing notification to the customer, in writing, when new service is ordered or thirty days prior to changing an existing meet point arrangement. The notification should include the following:

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2. General Regulations (Cont'd)

2.4 Payment Arrangements and Credit Allowances (Cont'd)

2.4.7 Access Services Provided by More Than One Telephone Company (Cont'd)

(B) Meet Point Billing (Cont'd)

- The Meet Point Billing Option that will be used,
- The Telephone Company(s) that will render the bill(s),
- The Telephone Company(s) to whom payment(s) should be remitted, and
- The Telephone Company(s) that will provide the bill inquiry function.

A Telephone Company that renders a meet point bill, the Bill Rendering Company, will render the bill in accordance with the industry standards as described in the Multiple Exchange Carrier Access Billing (MECAB) Guidelines and the Multiple Exchange Carrier Ordering and Design (MECOD) Guidelines. The bill will include cross reference(s) to the other telephone Company(s) providing service and common circuit identifiers. Should a billing dispute arise, the terms and conditions of the Bill Rendering company will apply.

(1) Single Bill Option

The single bill option allows the customer to receive one bill for access services that are provided by more than one company. The single bill option provides the following two billing alternatives: (C)

- Single Bill/Multiple Tariff, and (C) (D)
- Single Bill/Single Tariff

These options are described following in (a) and (b) respectively. (C) (C)

ACCESS SERVICE

2. General Regulations (Cont'd)

2.4 Payment Arrangements and Credit Allowances (Cont'd)

2.4.7 Access Services Provided by More Than One Telephone Company (Cont'd)

(B) Meet Point Billing (Cont'd)

(1) Single Bill Option (Cont'd)

(a) Single Bill/Multiple Tariff

The single bill/multiple tariff bill is prepared by the Bill Rendering Company but reflects all rates and charges for each connecting company's part of the service based on each company's access tariff.

The Bill Rendering Company will:

- determine and include all recurring and nonrecurring rates and charges for each involved Telephone Company;

- identify each involved Telephone Company's rates and charges separately on the bill;

- forward the bill to the customer and provide a copy of the bill or other substantiation of the charges to the connecting Telephone Companies; and

- advise the customer how to remit the payment, either directly to each Telephone Company involved in the provision of this meet point billed service, or, as a single payment made to the Bill Rendering Company. If payments are to be sent directly to the Bill Rendering Company, the non Bill Rendering Company(s) will provide the customer with written authorization for the payment arrangement.

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ACCESS SERVICE

2. General Regulations (Cont'd)

2.4 Payment Arrangements and Credit Allowances (Cont'd)

2.4.7 Access Services Provided by More Than One Telephone Company (Cont'd)

(B) Meet Point Billing (Cont'd)

(1) Single Bill Option (Cont'd)

(D)

(D)

ACCESS SERVICE

2. General Regulations (Cont'd)

2.4 Payment Arrangements and Credit Allowances (Cont'd)

2.4.7 Access Services Provided by More Than One Telephone Company (Cont'd)

(B) Meet Point Billing (Cont'd)

(1) Single Bill Option (Cont'd)

(D)

(D)

ACCESS SERVICE

2. General Regulations (Cont'd)

2.4 Payment Arrangements and Credit Allowances (Cont'd)

2.4.7 Access Services Provided by More Than One Telephone Company (Cont'd)

(B) Meet Point Billing (Cont'd)

(1) Single Bill Option (Cont'd)

(b) Single Bill/Single Tariff (T)

The single bill/single tariff bill provides a meet point bill that is billed completely at the Billing Rendering Company's tariff rates and regulations.

The Bill Rendering Company will:

- determine and include on the access bill all usage data and all other recurring and nonrecurring rates and charges per its access tariff; and

- forward the bill to the customer.

The customer will remit the payment to the Bill Rendering Company.

(2) Multiple Bill Option

Under the Multiple Bill Option each company providing the access service will render an access bill to the customer for its portion of the service based on its access tariff rates and regulations. For switched access Multiple bills, the end office company is generally the Initial Billing Company (IBC). The IBC is the company that calculates the access minutes to be billed to the customer and provides this data to each connecting company providing service, i.e., the Subsequent Billing Company(s). Each company, IBC and SBC, will:

ACCESS SERVICE

2. General Regulations (Cont'd)

2.4 Payment Arrangements and Credit Allowances (Cont'd)

2.4.7 Access Services Provided by More Than One Telephone Company (Cont'd)

(B) Meet Point Billing (Cont'd)

(2) Multiple Bill Option (Cont'd)

- prepare its own bill;
- determine its charge(s) for Local Transport, Directory Transport, and/or Channel Mileage as set forth in (3) following;
- determine and include all recurring and nonrecurring rates and charges of its access tariff;
- reflect its Billing Account Reference (BAR) and all connecting company Billing Account Cross Reference (BACR) code(s);
- forward its bill to the customer.

The customer will remit payment directly to each Bill Rendering Company.

(3) Determination of Meet Point Billed Local Transport, Directory Transport and Channel Mileage Charges

Each Telephone Company's portion of the Local Transport, Directory Transport and Channel Mileage will be developed as follows:

(a) Determine the appropriate Local Transport or Channel Mileage by computing the number of airline miles between the Telephone Company premises (end office, access tandem or serving wire centers for

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ACCESS SERVICE

2. General Regulations (Cont'd)

2.4 Payment Arrangements and Credit Allowances (Cont'd)

2.4.7 Access Services Provided by More Than One Telephone Company (Cont'd)

(B) Meet Point Billing (Cont'd)

(3) Determination of Meet Point Billed Local Transport, Directory Transport and Channel Mileage Charges (Cont'd)

(a) (Cont'd)
Switched Access or serving wire centers for Special Access) using the V&H method set forth respectively in 6.4.6 and 7.2.5 following.

(b) Determine the billing percentage (BP), as set forth in NATIONAL EXCHANGE CARRIER ASSOCIATION, INC. TARIFF F.C.C. NO. 4, which represents the portion of the service provided by each Telephone Company.

(c) For Feature Groups A, B, C and D Tandem Switched Transport

- multiply the number of originating and terminating access minutes of use routed over the facility times the number of airline miles, as set forth in (a) preceding, times the BP for each Telephone Company, as set forth in (b) preceding, times the Tandem Switched Facility rate;

- multiply the Tandem Switched Termination rate times the number of originating and terminating access minutes routed over the facility.

- When a tandem office is located within the operating territory of a Telephone Company participating in NECA's Traffic Sensitive Pool, multiply the Tandem Switching rate times the number of originating and terminating access minutes that are switched at the tandem.

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ACCESS SERVICE

2. General Regulations (Cont'd)

2.4 Payment Arrangements and Credit Allowances (Cont'd)

2.4.7 Access Services Provided by More Than One Telephone Company (Cont'd)

(B) Meet Point Billing (Cont'd)

(3) Determination of Meet Point Billed Local Transport, Directory Transport and Channel Mileage Charges (Cont'd)

(c) (Cont'd)
The Tandem Switched Termination rate is applied as set forth in 6.1.3(A) following. The Switched Access Nonrecurring Charges are applied as set forth in 6.4.1(B) following. (Note: The BP is not applied to the Switched Access Tandem Switched Termination rate or any Nonrecurring Charge.)

(d) For Feature Groups A, B, C, and D Direct Trunked Transport:

- multiply the number of airline miles, as set forth in (a) preceding, times the BP for each Telephone Company, as set forth in (b) preceding, times the Direct Trunked Facility rate.

- The Direct Trunked Termination rate is applied as set forth in 6.1.3(A) following. The Switched Access Nonrecurring Charges are applied as set forth in 6.4.1(B) following. (Note: The BP is not applied to either the Switched Access Direct Trunked Termination rate or any Nonrecurring Charge.)

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ACCESS SERVICE

2. General Regulations (Cont'd)

2.4 Payment Arrangements and Credit Allowances (Cont'd)

2.4.7 Access Services Provided by More Than One Telephone Company (Cont'd)

(B) Meet Point Billing (Cont'd)

(3) Determination of Meet Point Billed Local Transport, Directory Transport and Channel Mileage Charges (Cont'd)

(e) For Feature Groups A, B, C, and D.

(D)

(D)

- When the Entrance Facility and/or Multiplexing equipment is located within the operating territory of a Telephone Company participating in NECA's Traffic Sensitive Pool, the Entrance Facility and/or Multiplexing charge will apply.

- The Billing Percentage (BP) is not applicable to the Entrance Facility and Multiplexer charges. (C) (C)

(f) For Special Access, multiply the number of airline miles, as set forth in (a) preceding, times the BP for each Telephone Company, as set forth in (b) preceding, times the Channel Mileage Facility rate and add the Channel Mileage Termination rate.

ACCESS SERVICE

2. General Regulations (Cont'd)

2.4 Payment Arrangements and Credit Allowances (Cont'd)

2.4.7 Access Services Provided by More Than One Telephone Company (Cont'd)

(B) Meet Point Billing (Cont'd)

(3) Determination of Meet Point Billed Local Transport, Directory Transport and Channel Mileage Charges (Cont'd)

(f) (Cont'd)
The Special Access Channel Mileage Termination rate and nonrecurring charges are applied as set forth in 7.2.1(B)(2) and 7.2.2(C) following. (Note: The BP is not applied to either the Channel Mileage Termination Recurring Rate or any Nonrecurring Charge.)

(g) For Directory Assistance Service, multiply the Directory Transport rate times the number of directory assistance calls times the BP for each Telephone Company, as set forth in (b) preceding.

The Directory Assistance Nonrecurring charge is applied as set forth in 9.4.1(B) following. (Note: The BP is not applied to any Nonrecurring Charge.)

(h) When three or more Telephone Companies are involved in providing an Access Service, the intermediate Telephone Company(s) will determine the charges as set forth in (c) through (g) preceding. Additionally, when a segment of the Tandem Switched Facility, Direct Trunked Facility or Channel Mileage Facility is measured to the intermediate office(s), the Tandem Switched Termination, Direct Trunked Termination or Channel Mileage Termination rates are also applied at the intermediate Telephone Company(s) office(s).

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ACCESS SERVICE

2. General Regulations (Cont'd)

2.4 Payment Arrangements and Credit Allowances (Cont'd)

2.4.7 Access Services Provided by More Than One Telephone Company (Cont'd)

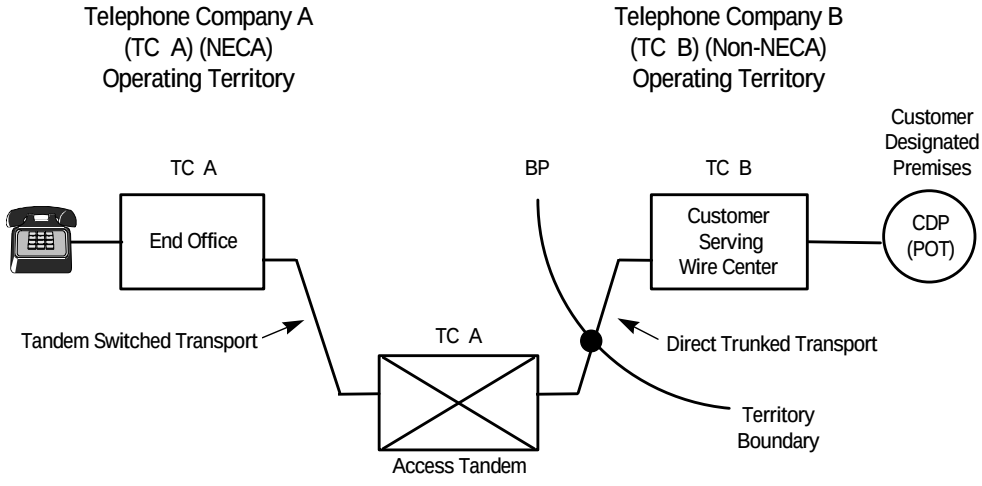
(B) Meet Point Billing (Cont'd)

(3) Determination of Meet Point Billed Local Transport, Directory Transport and Channel Mileage Charges (Cont'd)

(i) Example 1 - Switched Access

Layout

- Feature Group D Switched Access is ordered to End Office.
- End Office and Access Tandem are in the operating territory of a Telephone Company (TC-A) participating in NECA's Traffic Sensitive Pool.
- Customer Designated Premises is in the operating territory of a Telephone Company (TC-B) not participating in NECA's Traffic Sensitive Pool.



BP = Billing Percentage

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2. General Regulations (Cont'd)

2.4 Payment Arrangements and Credit Allowances (Cont'd)

2.4.7 Access Services Provided by More Than One Telephone Company (Cont'd)

(B) Meet Point Billing (Cont'd)

(3) Determination of Meet Point Billed Local Transport, Directory Transport and Channel Mileage Charges (Cont'd)

(i) Example 1 - Switched Access (Cont'd)

The following example reflects the rate calculations for TC-A, a Telephone Company participating in NECA's Traffic Sensitive Pool. Rates for a Non-Traffic Sensitive Pool member company would appear in that company's access tariff.

- Assume:

End Office to Access Tandem:
Airline miles from TC A End Office to TC A Access Tandem = 22.1, Rounded = 23

Access Tandem to Serving Wire Center:
Airline miles from TC A Access Tandem to TC B Serving Wire Center = 25.6, rounded = 26

Billing Percentage (BP)
TC A = 40%
TC B = 60%

Access Minutes = 9000

(D)

End Office Charges = EO

Tandem Switched Facility Rate = TSF

Tandem Switched Termination Rate = TST

Tandem Switching Rate = TS

Direct Trunked Facility Rate = DTF

Direct Trunked Termination Rate = DTT

ACCESS SERVICE

2. General Regulations (Cont'd)

2.4 Payment Arrangements and Credit Allowances (Cont'd)

2.4.7 Access Services Provided by More Than One Telephone Company (Cont'd)

(B) Meet Point Billing (Cont'd)

(3) Determination of Meet Point Billed Local Transport, Directory Transport and Channel Mileage Charges (Cont'd)

(i) Example 1 - Switched Access (Cont'd)

- Telephone Company A charges are:

(D)
(D)

End Office charges
= 9,000 min. x EO rate

Tandem Switched Facility charge
= 9,000 min. x 23 mi. x TSF rate

Tandem Switched Termination charge
= 2 terminations x 9,000 min. x TST rate

Tandem Switching charge
= 9,000 min. x TS rate

Direct Trunked Facility charge
= 26 miles x DTF rate x 40%

Direct Trunked Termination charge
= 1 termination x DTT rate

ACCESS SERVICE

2. General Regulations (Cont'd)

2.4 Payment Arrangements and Credit Allowances (Cont'd)

2.4.7 Access Services Provided by More Than One Telephone Company (Cont'd)

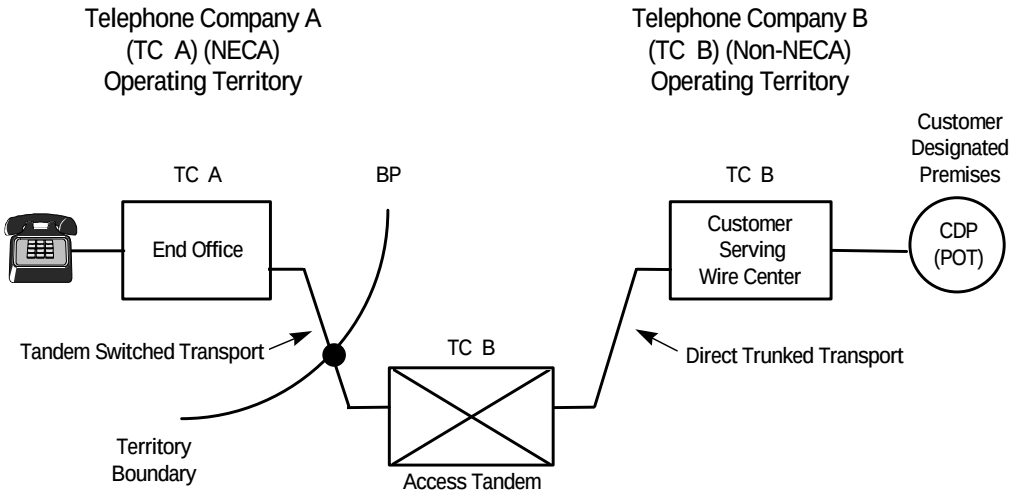
(B) Meet Point Billing (Cont'd)

(3) Determination of Meet Point Billed Local Transport, Directory Transport and Channel Mileage Charges (Cont'd)

(i) Example 2 - Switched Access

Layout

- Feature Group D Switched Access is ordered to End Office.
- End Office is in the operating territory of a Telephone Company (TC-A) participating in NECA's Traffic Sensitive Pool.
- Access Tandem and Customer Designated Premises are in the operating territory of a Telephone Company (TC-B) not participating in NECA's Traffic Sensitive Pool.



BP = Billing Percentage

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ACCESS SERVICE

2. General Regulations (Cont'd)

2.4 Payment Arrangements and Credit Allowances (Cont'd)

2.4.7 Access Services Provided by More Than One Telephone Company (Cont'd)

(B) Meet Point Billing (Cont'd)

(3) Determination of Meet Point Billed Local Transport, Directory Transport and Channel Mileage Charges (Cont'd)

(i) Example 2 - Switched Access (Cont'd)

The following example reflects the rate calculations for TC-A, a Telephone Company participating in NECA's Traffic Sensitive Pool. Rates for a Non-Traffic Sensitive Pool member company would appear in that company's access tariff.

- Assume:

End Office to Access Tandem:
Airline miles from TC A End Office to TC B Access Tandem = 22.1, Rounded = 23

Billing Percentage (BP)
TC A = 80%
TC B = 20%

Access Tandem to Serving Wire Center:
Airline miles from TC B Access Tandem to TC B Serving Wire Center = 25.6, rounded = 26

Access Minutes = 9000

(D)

End Office Charges = EO

Tandem Switched Facility Rate = TSF

Tandem Switched Termination Rate = TST

Tandem Switching Rate = TS

Direct Trunked Facility Rate = DTF

Direct Trunked Termination Rate = DTT

ACCESS SERVICE

2. General Regulations (Cont'd)

2.4 Payment Arrangements and Credit Allowances (Cont'd)

2.4.7 Access Services Provided by More Than One Telephone Company (Cont'd)

(B) Meet Point Billing (Cont'd)

(3) Determination of Meet Point Billed Local Transport, Directory Transport and Channel Mileage Charges (Cont'd)

(i) Example 2 - Switched Access (Cont'd)

- Telephone Company A charges are:

(D)
(D)

End Office charges
= 9,000 min. x EO rate

Tandem Switched Facility charge
= 9,000 min. x 23 mi. x TSF rate
x 80%

Tandem Switched Termination charge
= 1 termination x 9,000 min.
x TST rate

ACCESS SERVICE

2. General Regulations (Cont'd)

2.6 Definitions

Certain terms used herein are defined as follows:

800 Data Base Access Service

The term "800 Data Base Access Service" denotes a service which uses a data base system to identify 800 access customers on a 10-digit basis. For purposes of administering the rules and regulations set forth in this tariff regarding the provision of 800 Database Access, except where otherwise specified, 800 Database Access Service shall include the following service access codes 800, 888, 877, 866, 855, 844, 833, and 822.

800 Series

The term 800 series denotes the service access codes of 800, 888, 877, 866, 855, 844, 833, and 822.

Access Code

The term "Access Code", with the exception of Feature Group B (FGB) with an Abbreviated Dial Arrangement (ADA), denotes a uniform access code assigned by the Telephone Company to an individual customer in the form 101XXXX and 950-XXXX. Access codes for FGB with an ADA are explained in 6.9.2 following.

Access Minutes

For the purpose of calculating chargeable usage, the term "Access Minutes" denotes customer usage of exchange facilities in the provision of interstate or foreign service. On the originating end of an interstate or foreign call, usage is measured from the time the originating end user's call is delivered by the Telephone Company to and acknowledged as received by the customer's facilities connected with the originating exchange. On the terminating end of an interstate or foreign call, usage is measured from the time the call is received by the end user in the terminating exchange. Timing of usage at both originating and terminating ends of an interstate or foreign call shall terminate when the calling or called party disconnects, whichever event is recognized first in the originating and terminating exchanges, as applicable.

Access Tandem

The term "Access Tandem" denotes a Telephone Company or centralized equal access provider switching system that provides a concentration and distribution function for originating or terminating traffic between end offices and a customer designated premises.

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ACCESS SERVICE

2. General Regulations (Cont'd)

2.6 Definitions (Cont'd)

Business Day

The term "Business Day" denotes the times of day that a company is open for business. Generally, in the business community, these are 8:00 or 9:00 a.m. to 5:00 or 6:00 p.m., respectively, with an hour for lunch, Monday through Friday, resulting in a standard forty (40) hour work week. However, Business Day hours for the Telephone Company may vary based on company policy, union contract and location. To determine such hours for an individual company, or company location, that company should be contacted at the address shown under the Issuing Carrier's name listed on Title Pages 2 through 68 preceding.

Busy Hour Minutes of Capacity (BHMC)

The term "Busy Hour Minutes of Capacity (BHMC)" denotes the customer specified maximum amount of Switched Access Service and/or Directory Assistance Service access minutes the customer expects to be handled in an end office switch during any hour in an 8:00 a.m. to 11:00 p.m. period for the Feature Group and/or Directory Assistance Service ordered. This customer specified BHMC quantity is the input data the Telephone Company uses to determine the number of transmission paths for the Feature Group and/or Directory Assistance Service ordered.

Call

The term "Call" denotes a customer attempt for which complete address information (e.g., 0-, 911, or 10 digits) is provided to the serving dial tone office.

Carrier Identification Code (CIC)

The term "Carrier Identification Code (CIC)" denotes a numeric code assigned by the North American Numbering Plan (NANP) Administrator for the provisioning of Feature Group B or Feature Group D Switched Access Services. The numeric code is unique to each carrier and is used by the Telephone Company to route switched access traffic to the Customer Designated Premises.

Carrier or Common Carrier

See Interexchange Carrier.

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ACCESS SERVICE

2. General Regulations (Cont'd)

2.6 Definitions (Cont'd)

Legal Holiday

The term "Legal Holiday" denotes days other than Saturday or Sunday for which the Telephone Company is normally closed. These include New Year's Day, Independence Day, Thanksgiving Day, Christmas Day and a day when Washington's Birthday, Memorial Day or Columbus Day is legally observed and other locally observed holidays when the Telephone Company is closed.

Line Side Connection

The term "Line Side Connection" denotes a connection of a transmission path to the line side of a local exchange switching system.

Local Access and Transport Area (LATA)

The term "Local Access and Transport Area" denotes a geographic area established for the provision and administration of communications service. It encompasses one or more designated exchanges, which are grouped to serve common social, economic and other purposes.

Local Number Portability (LNP)

The term "Local Number Portability (LNP)" denotes the ability of an end user of local exchange telecommunications service to retain an existing telephone number without impairment of quality, reliability, or convenience when switching from one local exchange telecommunications carrier to another.

Location Routing Number (LRN)

The term "Location Routing Number (LRN)" denotes a unique NPA-NXX-XXXX that serves as a routing number associated with a central office switch that has subscribers that have transferred their telephone numbers from one local exchange telecommunications carrier to another.

Certain material formerly found on this page now appears on Original Page 2-73.1.

2. General Regulations (Cont'd)

2.6 Definitions (Cont'd)

Milliwatt (102 Type) Test Line

The term "Milliwatt (102 Type) Test Line" denotes an arrangement in an end office which provides a 1004 Hz tone at 0 dBm0 for one-way transmission measurements towards the customer's premises from the Telephone Company end office.

N-1 Carrier (N)

The term "N-1 Carrier" denotes the telecommunications carrier, prior to the terminating carrier, responsible for querying an LNP database to determine the routing of a call for a number portable NXX code. (N)

Network Control Signaling

The term "Network Control Signaling" denotes the transmission of signals used in the telecommunications system which perform functions such as supervision (control, status, and charge signals), address signaling (e.g., dialing), calling and called number identifications, rate of flow, service selection error control and audible tone signals (call progress signals indicating re-order or busy conditions, alerting, coin denominations, coin collect and coin return tones) to control the operation of the telecommunications system.

Nonsynchronous Test Line

The term "Nonsynchronous Test Line" denotes an arrangement in step-by-step end offices which provides operational tests which are not as complete as those provided by the synchronous test lines, but can be made more rapidly.

North American Numbering Plan

The term "North American Numbering Plan" denotes a three-digit area code (Numbering Plan Area - NPA) and a seven-digit telephone number made up of a three-digit Central Office prefix plus a four-digit station number.

Off-hook

The term "Off-hook" denotes the active condition of Switched Access or a Telephone Exchange Service line.

ACCESS SERVICE

2. General Regulations (Cont'd)

2.6 Definitions (Cont'd)

Registered Equipment

The term "Registered Equipment" denotes the customer's premises equipment which complies with and has been approved within the Registration Provisions of Part 68 of the F.C.C.'s Rules and Regulations.

Service Access Code

The term "Service Access Code" denotes a 3 digit code in the NPA format which is used as the first three digits of a 10 digit address and which is assigned for special network uses. Whereas NPA codes are normally used for identifying specific geographical areas, certain Service Access Codes have been allocated in the North American Numbering Plan to identify generic services or to provide access capability. Examples of Service Access Codes include the 800 and 900 codes.

Service Switching Point (SSP)

The term "Service Switching Point" denotes an end office or tandem which, in addition to having SS7 and SP capabilities, is also equipped to query centralized data bases.

Serving Wire Center

The term "Serving Wire Center" denotes the wire center from which the customer designated premises would normally obtain dial tone from the Telephone Company.

Seven Digit Manual Test Line

The term "Seven Digit Manual Test Line" denotes an arrangement which allows the Customer to select balance, milliwatt and synchronous test lines by manually dialing a seven digit number over the associated access connection.

Shortage of Facilities or Equipment

The term "Shortage of Facilities or Equipment" denotes a condition which occurs when the Telephone Company does not have appropriate cable, switching capacity, bridging or, multiplexing equipment, etc., necessary to provide the Access Service requested by the customer.

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ACCESS SERVICE

6. Switched Access Service (Cont'd)

6.1 General (Cont'd)

6.1.3 Rate Categories (Cont'd)

(A) Local Transport (Cont'd)

(8) Interface Groups

Ten Interface Groups are provided for terminating the Entrance Facility at the customer's designated premises. Technical specifications concerning the available interface groups are set forth in Section 15.1, following. (M)(T)

(9) Nonchargeable Optional Features

Where transmission facilities permit, the individual transmission path between the customer's designated premises and the first point of switching, may at the option of the customer, be provided with the following optional features as set forth and described in Section 15.1.1(E), following. (T)

- Supervisory Signaling
- Customer Specified Entry Switch Receive Level
- Customer Specification of Local Transport Termination
- 64 Clear Channel Capability

In addition to the above, Shared SONET Interoffice Ring Transport (SSRIT) is available as a nonchargeable optional feature with High Capacity DS3 or Synchronous Optical Channel Local Transport service from wire centers identified in the NATIONAL EXCHANGE CARRIER ASSOCIATION, INC. TARIFF F.C.C. NO. 4, WIRE CENTER INFORMATION. The SSRIT feature is set forth and described in Sections 7.10.3(E) and 7.11.3(C), following. (T)

When a customer subscribes to Common Channel Signaling (SS7) Network Connection Service (CCSNC Service), the following optional features are made available and are described in Section 6.10.1, following. (T)

- Signaling System 7 (SS7) Signaling
- Calling Party Number
- Carrier Selection Parameter
- Charge Number Parameter
- Carrier Identification Parameter

Certain material currently found on this page previously appeared on 5th Revised Page 6-11.

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ACCESS SERVICE

6. Switched Access Service (Cont'd)

6.1 General (Cont'd)

6.1.3 Rate Categories (Cont'd)

(A) Local Transport (Cont'd)

(10) Chargeable Optional Features

Common Channel Signaling, Signaling System 7 (CCS/SS7) Network Connection (CCSNC) Service provides a signaling path between a customer's designated Signaling Point of Interface (SPOI) and a Telephone Company's Signaling Transfer Point (STP). CCSNC is provided as set forth in Section 6.10.3, following.

800 Data Base Access Service is provided to all customers in conjunction with FGC and FGD switched access service. A Basic or Vertical Feature Query charge, as set forth in Section 17.2.2 (B), following, is assessed for each completed query returned from the 800 data base whether or not the actual call is delivered to the customer. The query is considered completed when the appropriate call routing information is returned to the Service Switching Point (SSP) that launched the query. The Basic Query provides the identification of the customer to whom the call will be delivered and includes area of service routing which allows routing of 800 series calls by telephone companies to different interexchange carriers based on the Local Access Transport Area (LATA) in which the call originates. The Vertical Feature Query provides this same customer identification function in addition to vertical features which may include: (1) call validation (ensuring that calls originate from subscribed service areas);

Certain material formerly found on this page now appears on 7th Revised Page 6-13.

ACCESS SERVICE

6. Switched Access Service (Cont'd)

6.1 General (Cont'd)

6.1.3 Rate Categories (Cont'd)

(A) Local Transport (Cont'd) (T)

(10) Chargeable Optional Features (Cont'd) (N)

(2) POTS translation of 800 series numbers (which is generally necessary for the routing of 800 series calls); (3) alternate POTS translation (which allows subscribers to vary the routing of 800 series calls based on factors such as time of day, place of origination of the call, etc.); and (4) multiple carrier routing (which allows subscribers to route to different carriers based on factors similar to those in (3)). (M)

(B) End Office

The End Office rate category establishes the charges related to the local end office switching and end user termination functions necessary to complete the transmission of Switched Access communications to and from the end users served by the local end office. The End Office rate category includes the Local Switching and Information Surcharge rate elements. Directory Assistance Service is set forth in Section 9, following. (M)

(1) Local Switching

The Local Switching rate element establishes the charges related to the use of end office switching equipment, the terminations in the end office of end user lines, the terminations of calls at Telephone Company Intercept Operators or recordings, the STP costs, and the SS7 signaling function between the end office and the Signaling Transfer Point.

Certain material currently found on this page previously appeared on 8th Revised Page 6-12.

ACCESS SERVICE

6. Switched Access Service (Cont'd)

6.1 General (Cont'd)

6.1.3 Rate Categories (Cont'd)

(C) Chargeable Optional Features (Cont'd)

(2) Operator Transfer Services (Cont'd)

Operator Transfer Service charges, provided for in this tariff, are applied only to those calls actually transferred by the Telephone Company to the customer's operator.

(3) 800 Data Base Access Service

800 Data Base Access Service is provided to all customers in conjunction with FGC and FGD switched access service. When a 1+800 series+NXX-XXXX call is originated by an end user, the Telephone Company will utilize the Signaling System 7 (SS7) network to query an 800 data base to identify the customer to whom the call will be delivered and provide vertical features based on the dialed ten digits. The call will then be routed to the identified customer over FGC or FGD switched access. The 800 series includes the following service access codes: 800, 888, 877, 866, 855, 844, 833 and 822.

Certain material formerly found on this page now appears on 6th Revised Page 6-18.2.

ACCESS SERVICE

6. Switched Access Service (Cont'd)

6.1 General (Cont'd)

6.1.3 Rate Categories (Cont'd)

(C) Chargeable Optional Features (Cont'd)

(3) 800 Data Base Access Service (Cont'd)

A Basic or Vertical Feature Query charge, as set forth in 17.2.2(B) following, is assessed for each completed query returned from the data base identifying the customer to whom the call will be delivered whether or not the actual call is delivered to the customer. The query is considered completed when the appropriate call routing information is returned to the Service Switching Point (SSP) that launched the query. The Basic Query provides the identification of the customer to whom the call will be delivered and includes area of service routing which allows routing of 800 series calls by telephone companies to different interexchange carriers based on the Local Access Transport Area (LATA) in which the call originates. The Vertical Feature Query provides the same customer identification as the basic query and vertical features which may include: (1) call validation, (ensuring that calls originate from subscribed service areas); (2) POTS translation of 800 series numbers; (3) alternate POTS translation (which allows subscribers to vary the routing of 800 series calls based on factors such as time of day, place or origination of the call, etc.); and (4) multiple carrier routing (which allows subscribers to route to different carriers based on factors similar to those in (3)). (M)

The description and application of this charge with respect to Feature Group C or Feature Group D is as set forth in 6.4.1(C)(2) and 6.4.1(C)(8) following.

Certain material currently found on this page previously appeared on 4th Revised Page 6-18.1.

ACCESS SERVICE

6. Switched Access Service (Cont'd)

6.4 Rate Regulations (Cont'd)

6.4.1 Description and Application of Rates and Charges (Cont'd)

(C) Application of Rates (Cont'd)

(7) Common Channel Signaling/Signaling System 7 (CCS/SS7) Network Connection Service

The CCS/SS7 Network Connection is comprised of a Signaling Mileage Facility charge, a Signaling Mileage Termination charge, a Signaling Entrance Facility charge, and a Signaling Transfer Point (STP) Port charge.

The Signaling Mileage Facility charge is assessed on a per facility per mile basis. The Signaling Mileage Termination charge is assessed on a per termination basis (i.e., at each end of the Signaling Mileage Facility). When the Signaling Mileage Facility mileage measurement is zero, Signaling Mileage Termination charges do not apply.

The Signaling Entrance Facility charge is assessed on a per facility basis for the connection between the customer's designated premises (Signaling Point of Interface) and the serving wire center of that premises.

The STP Port charge is assessed on a per port basis for each termination of a Signaling Mileage Facility at an STP.

(8) 800 Data Base Access Service

A Basic Query or Vertical Feature Query charge applies for each completed query that is returned from the 800 data base identifying the customer to whom the call will be delivered whether or not the actual call is delivered to the customer. The query is considered completed when the appropriate call routing information is returned to the Service Switching Point (SSP) that launched the query. Query charges, as set forth in 17.2.2(B), will only be applied by those companies whose wire centers are identified as assessing query charges in the NATIONAL EXCHANGE CARRIER ASSOCIATION, INC. TARIFF F.C.C. NO. 4.

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6. Switched Access Service (Cont'd)

6.4 Rate Regulations (Cont'd)

6.4.1 Description and Application of Rates and Charges (Cont'd)

(C) Application of Rates (Cont'd)

(8) 800 Data Base Access Service (Cont'd)

When Feature Group C or Feature Group D switched access service is used for the provision of 800 Data Base Access Service and the total minutes of use and/or count of queries can be determined for each customer at a tandem or SSP but can not be determined by individual end office, an allocation method will be utilized to determine minutes of use and/or queries by end office and customer. For each end office a ratio will be developed and applied against the total minutes of use and/or count of queries for a given customer as determined by the tandem or SSP. These ratios will be developed by dividing the unidentified originating 800 series minutes of use at an end office by the total unidentified originating minutes of use in all end offices subtending the tandem or SSP. For example, assume:

- Three end offices (EO-1, EO-2, and EO-3) subtend a tandem

  EO-1 measures 2,000 minutes of 800 use
  EO-2 measures 3,000 minutes of 800 use
  EO-3 measures 5,000 minutes of 800 use
  10,000 TOTAL

- The tandem delivers 800 usage to two customers:

  IC-A has 4,000 minutes of use
  IC-B has 6,000 minutes of use

- The allocation ratio for EO-1 is 20%

  2,000/10,000

- The minutes of use to be billed by EO-1 are

  800 to IC-A (20% X 4,000)
  1,200 to IC-B (20% X 6,000)
  2,000 TOTAL

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ACCESS SERVICE

6. Switched Access Service (Cont'd)

6.8 Description and Provision of Feature Group D (FGD) (Cont'd)

6.8.2 Optional Features (Cont'd)

(B) Transport Termination Options

(1) Operator Trunk - Full Feature

The Operator Trunk optional feature is set forth in 6.10.2(C) following.

(C) Local Transport Options

(1) Supervisory Signaling

The Supervisory Signaling optional feature, due to its technical nature, is set forth in 15.1.1 following.

(2) Signaling System 7 (SS7)

The SS7 optional feature allows the customer to send and receive signals for out of band call set up and is available with Feature Group D. This option requires the establishment of a signaling connection between the customer's designated premises/Signaling Point of Interface (SPOI) and a Telephone Company's Signaling Transfer Point (STP).

SS7 is provided in both the originating and terminating direction on FGD and each signaling connection is provisioned for two-way SS7 signaling information.

Certain material formerly found on this page now appears on Original Page 6-94.1.

ACCESS SERVICE (N)

6. Switched Access Service (Cont'd)

6.8 Description and Provision of Feature Group D (FGD) (Cont'd)

6.8.2 Optional Features (Cont'd)

(C) Local Transport Options (Cont'd) (N)

(3) Multifrequency Address Signaling (M)

(4) Calling Party Number (CPN) Parameter

(5) Charge Number Parameter (CNP)

(6) Carrier Selection Parameter (CSP)

(7) 64 Clear Channel Capability

The 64 Clear Channel Capability optional feature, due to its technical nature, is set forth in 15.1.1 following.

(8) Carrier Identification Parameter (CIP)

(D) Chargeable Optional Features

(1) Interim NXX Translation

The Interim NXX Translation Optional Feature is set forth in 6.10.3(A) following. (M)

Certain material currently found on this page previously appeared on 10th Revised Page 6-94.

ACCESS SERVICE

6. Switched Access Service (Cont'd)

6.8 Description and Provision of Feature Group D (FGD) (Cont'd)

6.8.2 Optional Features (Cont'd)

(D) Chargeable Optional Features

(2) Operator Transfer Service

The Operator Transfer Service Optional Feature is provided as set forth in 6.10.3 following.

(3) Common Channel Signaling/Signaling System 7 (CCS/SS7) Network Connection Service (CCSNC)

The CCSNC Optional Feature is provided as set forth in 6.10.3 following.

6.8.3 Design and Traffic Routing

For Feature Group D, the Telephone Company shall design and determine the routing of Tandem Switched Transport service, including the selection of the first point of switching and the selection of facilities from the interface to any switching point and to the end offices where busy hour minutes of capacity are ordered. The Telephone Company shall also decide if capacity is to be provided by originating only, terminating only, or two-way trunk groups. Finally, the Telephone Company will decide whether trunk side access will be provided through the use of two-wire or four-wire trunk terminating equipment.

For Feature Group D Direct Trunked Transport service, the Telephone Company will determine the routing of Switched Access Service from the point of interface to the first point of switching or, if the customer specifies one or more hub locations for multiplexing, from the point of interface to the hub location, from one hub location to another hub location, and/or from a hub location to the first point of switching.

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ACCESS SERVICE

6. Switched Access Service (Cont'd)

6.10 Chargeable and Nonchargeable Optional Features (Cont'd)

6.10.1 Common Switching Nonchargeable Optional Features

The following table shows the Feature Groups with which the optional features are available.

Option	Available Feature Groups A	B	C	D
A) Call Denial on Line or Hunt Group	X			
B) Service Code Denial on Line or Hunt Group	X			
C) Hunt Group Arrangement	X			
D) Uniform Call Distribution Arrangement	X			
E) Nonhunting Number for Use with Hunt Group or Uniform Call Distribution Arrangement	X			
F) Automatic Number Identification (ANI)		X	X	X
G) Up to 7 Digit Outpulsing of Access Digits to Customer		X		
H) Delay Dial Start-Pulsing Signaling			X	
I) Immediate Dial Pulse Address Signaling			X	
J) Dial Pulse Address Signaling			X	
K) Service Class Routing			X	X
L) Alternate Traffic Routing		X	X	X
M) Trunk Access Limitation			X	X
N) Call Gapping Arrangement				X
O) International Carrier Option				X
P) Band Advance Arrangement for Use with Special Access Service Utilized in the Provision of WATS or WATS-Type Services	X	X	X	X
Q) End Office End User Line Service Screening for Use with Special Access Service Utilized in the Provision of WATS or WATS-Type Services			X	X
R) Hunt Group Arrangement for Use with Special Access Service Utilized in the Provision of WATS or WATS-Type Services	X	X	X	X
S) Uniform Call Distribution Arrangement for Use with Special Access Service Utilized in the Provision of WATS or WATS-Type Services	X	X	X	X
T) Nonhunting Number Associated with Hunt Group Arrangement or Uniform Call Distribution Arrangement for Use with Special Access Service Utilized in the Provision of WATS or WATS-Type Services	X	X	X	X
U) Digital Switched 56 Service			X	X
V) Multifrequency Address Signaling			X	X
W) Signaling System 7 (SS7) Signaling			X	X
X) Calling Party Number (CPN)			X	X
Y) Carrier Selection Parameter (CSP)				X
Z) Charge Number Parameter (CNP)			X	X
AA) Flexible Automatic Number Identification (Flex ANI)				X
AB) Carrier Identification Parameter (CIP)				X

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ACCESS SERVICE

6. Switched Access Service (Cont'd)

6.10 Chargeable and Nonchargeable Optional Features (Cont'd)

6.10.1 Common Switching Nonchargeable Optional Features (Cont'd)

(F) Automatic Number Identification (ANI)

(1) This option provides the automatic transmission of a seven digit or ten digit number and information digits to the customer designated premises for calls originating in the LATA, to identify the calling station. The ANI feature is an end office software function which is associated on a call-by-call basis with:

(a) all individual transmission paths in a trunk group routed directly between an end office and a customer designated premises or, where technically feasible, with

(b) all individual transmission paths in a trunk group between an end office and an access tandem, and a trunk group between an access tandem and a customer designated premises.

(2) The seven digit ANI telephone number is generally available with Feature Groups B and C. With these Feature Groups, technical limitations may exist in Telephone Company switching facilities which require ANI to be provided only on a directly trunked basis. ANI will be transmitted on all calls except those originating from multiparty lines, pay telephones using Feature Group B, or when an ANI failure has occurred. Seven digit ANI is not available with SS7 Signaling.

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ACCESS SERVICE

6. Switched Access Service (Cont'd)

6.10 Chargeable and Nonchargeable Optional Features (Cont'd)

6.10.1 Common Switching Nonchargeable Optional Features (Cont'd)

(F) Automatic Number Identification (ANI) (Cont'd)

(3) The ten digit ANI telephone number is only available with Feature Group D. The ten digit ANI telephone number consists of the Number Plan Area (NPA) plus the seven digit ANI telephone number. The ten digit ANI telephone number will be transmitted on all calls except those identified as multiparty line or ANI failure, in which case only the NPA will be transmitted (in addition to the information digit described below). Ten digit ANI is provided with multifrequency address signaling or SS7 signaling.

(4) With Feature Group C, at the option of the customer, ANI may be ordered from end offices where Telephone Company recording for end user billing is not provided. Additionally, ANI is provided from end offices where message detail recording is not required by the Telephone Company; as with 800 series service. ANI is not provided from end offices where the Telephone Company forwards ANI to its recording equipment.

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ACCESS SERVICE

6. Switched Access Service (Cont'd)

6.10 Chargeable and Nonchargeable Optional Features (Cont'd)

6.10.1 Common Switching Nonchargeable Optional Features (Cont'd)

(F) Automatic Number Identification (ANI) (Cont'd)

(5) Where complete ANI detail cannot be provided, e.g., on calls from 4 and 8 party services, information digits will be provided to the customer.

The information digits identify:

(a) telephone number is the station billing number - no special treatment required,

(b) multiparty line - telephone number is a 4- or 8- party line and cannot be identified - number must be obtained via an operator or in some other manner,

(c) ANI failure has occurred in the end office switch which prevents identification of calling telephone number - must be obtained by operator or in some other manner,

(d) hotel/motel originated call which requires room number identification,

(e) coinless station, hospital, inmate, etc. call which requires special screening or handling by the customer, and

(f) call is an Automatic Identified Outward Dialed (AIOD) call from customer premises equipment. The AIOD ANI telephone number is the listed telephone number of the customer and is not the telephone number of the calling party.

These ANI information digits are generally available with Feature Groups B, C, and D.

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ACCESS SERVICE

6. Switched Access Service (Cont'd)

6.10 Chargeable and Nonchargeable Optional Features (Cont'd)

6.10.1 Common Switching Nonchargeable Optional Features (Cont'd)

(F) Automatic Number Identification (ANI) (Cont'd)

(6) Additional ANI information digits are available with Feature Group D also. They include:

(a) InterLATA restricted - telephone number is identified line

(b) InterLATA restricted - hotel/motel line

(c) InterLATA restricted - coinless, hospital, inmate, etc., line

These information digits will be transmitted as agreed to by the customer and the Telephone Company.

Flexible Automatic Number Identification (Flex ANI) is an enhancement to ANI and is offered as a Common Switching Nonchargeable Optional Feature of Feature Group D as described in 6.10.1(AA) following.

(7) Restrictions on Use and Sale of ANI

(a) Interstate access customers of this tariff may use ANI in the following manner:

(i) For billing and collection information, for routing, screening, and completing the originating subscriber's call or transaction, or for services directly related to the originating telephone subscriber's call or transaction.

The customer may use ANI to offer a product or service that is directly related to the products or services previously acquired from the customer by the originating subscriber.

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6. Switched Access Service (Cont'd)

6.10 Chargeable and Nonchargeable Optional Features (Cont'd)

6.10.1 Common Switching Nonchargeable Optional Features (Cont'd)

(V) Multifrequency Address Signaling

Multifrequency Address Signaling is available as an optional feature with FGC and FGD. This feature provides for the transmission of number information and control signals (e.g., number address signals, automatic number identification) between the end office switch and the customer's premises (in either direction). Multifrequency signaling arrangements make use of pairs of frequencies out of a group of six frequencies. Specific information transmitted is dependent upon feature group and call type (i.e., POTS, coin or operator). This feature is not available in combination with SS7 signaling.

(W) Signaling System 7 (SS7) Signaling

This feature provides common channel out of band transmission of address and supervisory SS7 protocol signaling information between the end office switch or the tandem office switching system and the customer's designated premises. The signaling information is transmitted over facilities provided with the Common Channel Signaling/Signaling System 7 Network Connection Service (CCSNC) as specified in 6.1.3(A)(8) preceding. This feature is available with FGC and FGD and will be provided in accordance with the SS7 Interconnect specifications described in Technical Reference GR-905-CORE. (T)

(X) Calling Party Number (CPN)

This feature provides for the automatic transmission of the ten digit telephone number, associated with a calling station, to the customer's premises for calls originating in the LATA. The ten digit telephone number consists of the NPA plus the seven digit telephone number, which may or may not be the same number as the calling station's charge number. The ten digit telephone number will be coded as presented, or restricted via a "privacy indicator" for delivery to the called end user. This feature is automatically provided with originating FGC and FGD with SS7 signaling. CPN is available where technically feasible.

ACCESS SERVICE

6. Switched Access Service (Cont'd)

6.10 Chargeable and Nonchargeable Optional Features (Cont'd)

6.10.3 Chargeable Optional Features (Cont'd)

(C) Common Channel Signaling/Signaling System 7 Network Connection Service (CCSNC) (Cont'd)

CCS/SS7 Network Connection Service is comprised of two parts; a Signaling Network Access Link (SNAL, consisting of Signaling Mileage Facility, Signaling Mileage Termination and Signaling Entrance Facility) and a Signaling Transfer Point (STP) Port. The SNAL is provided as a dedicated 56 Kbps out-of-band signaling connection between the customer's SPOI and the STP Port on the STP.

The CCS/SS7 Network Connection Service is provisioned by a mated pair of STPs as described in Technical Reference TR-TSV 000905 in order to ensure network availability and reliability. The Telephone Company shall not be held liable for service outages if the customer employs technology related to the interconnection of signaling networks that do not adhere to generally accepted industry technical standards.

When CCS/SS7 Network Connection service is provisioned for use with SS7 Signaling, interconnection between signalling networks must occur at an STP.

Rates and charges for the CCS/SS7 Network Connection STP Ports and Signaling Network Access Links are contained in Section 17.2.2, following. The Telephone Company specific rate band assignment for the STP Port and Signaling Network Access Link rate elements is specified in the Local Transport/Special Access column in Section 17.5.1, following. (T) (C) (C)

(D) 800 Data Base Access Service

800 Data Base Access Service is provided with FGC or FGD Switched Access Service. When a 1+800series+NXX-XXXX call is originated by an end user, the Telephone Company will utilize the Signalling System 7 (SS7) network to query an 800 data base to perform the identification function. The call will then be routed to the identified customer over FGC or FGD switched access. The 800 series includes the following service area codes: 800, 888, 877, 866, 855, 844, 833 and 822.

ACCESS SERVICE

6. Switched Access Service (Cont'd)

6.10 Chargeable and Nonchargeable Optional Features (Cont'd)

6.10.3 Chargeable Optional Features (Cont'd)

(D) 800 Data Base Access Service (Cont'd)

The manner in which 800 data base access service is provided is dependent on the availability of SS7 service at the end office from which the service is provided as outlined following:

- When 800 data base access service originates at an end office equipped with Service Switching Point (SSP) capability for querying centralized data bases or at a non-SSP equipped end office that can accommodate direct trunking of originating 800 series calls, all such service will be provisioned from that end office.

- When 800 data base access service originates at an end office not equipped with SSP customer identification capability, the 800 series call will be delivered to the access tandem on which the end office is homed for 800 series service and which is equipped with the SSP feature to query centralized data bases.

- When 800 data base access service originates at an end office equipped with SSP capability that is not capable of accommodating direct trunking of originating 800 series (other than the 800 service access codes) calls, the 800 series (other than the 800 service access codes) call will be delivered to the access tandem on which the end office is homed and which is equipped with the SSP feature to query centralized data bases.

Query charges as set forth in 17.2.2 following are in addition to those charges applicable for the Feature Group C or Feature Group D switched access service.

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ACCESS SERVICE

6. Switched Access Service (Cont'd)

6.10 Chargeable and Nonchargeable Optional Features (Cont'd)

6.10.3 Chargeable Optional Features (Cont'd)

(D) 800 Data Base Access Service (Cont'd)

The Federal Communications Commission ("FCC") has concluded that hoarding, defined as the acquisition of more toll free numbers than one intends to use for the provision of toll free service, as well as the sale of a toll free number by a private entity for a fee, is contrary to the public interest in the conservation of the scarce toll free number resource and contrary to the FCC's responsibility to promote the orderly use and allocation of toll free numbers.

(x) Issued to reflect new corporate address.

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13. Additional Engineering, Additional Labor and Miscellaneous Services (Cont'd)

13.14 Local Number Portability (Cont'd) (T)

13.14.2 LNP Query Service (T)

(A) Description

LNP Query Service uses Advanced Intelligent Network (AIN) technology and the Common Channel Signaling (CCS) network to query an LNP database to obtain network routing instructions before completion of a call. The LNP database contains all of the TNs within an NXX and the location routing number (LRN) of the switch serving each of those TNs when at least one of the TNs within the NXX has been transferred from one telecommunications service provider to another. The LRN associates a unique NPA-NXX-XXXX routing number with each central office switch that has subscribers who have transferred their TNs. (C) (C)

Where more than one carrier is involved in completing the call, the carrier prior to the terminating carrier (i.e., the N-1 carrier) is responsible for querying an LNP database to obtain the LRN used in routing the call for a number portable NXX code. When the N-1 carrier forwards a non-queried call to a Telephone Company end office or tandem switch and the NXX code has one or more transferred TNs, the Telephone Company's end office or tandem switch will suspend call processing and formulate and launch a query to an LNP database to secure the LRN of the transferred TN. When the LRN has been returned from an LNP database to the Telephone Company end office or tandem switch originating the query, call processing is resumed and the call is either processed in the Telephone Company's network or routed to the correct telecommunications service provider's network for completion to the called party. The Telephone Company will perform the query on behalf of the N-1 carrier (i.e., the LNP query service customer) that forwarded the call. The Telephone Company will bill the N-1 wireline or wireless telecommunications carrier a charge per query as specified in Section 17.4.4 (Q), following, regardless of whether the call is completed. (C) (T)

An LNP Order Charge will apply on a per order basis for those customers that have ordered LNP Query Service as specified in Section 17.4.4 (Q), following. N-1 carriers who terminate non-queried traffic into the Telephone Company's network and have not placed an order for LNP Query Service will be assessed on a per account basis an LNP Billing Charge as specified in Section 17.4.4 (Q), following. (T) (T) (T)

13. Additional Engineering, Additional Labor and Miscellaneous Services (Cont'd)

13.14 Local Number Portability (Cont'd) (T)

13.14.2 LNP Query Service (Cont'd) (T)

(B) Limitations

LNP Query Service is to be used only on a call-by-call basis for routing calls to number portable NXX codes and cannot be used for purposes other than those functions described herein.

(C) Network Management

The Telephone Company will administer its network to ensure the provision of acceptable service levels to all customers of the LNP Query Service.

The Telephone Company reserves the right to block any LNP query traffic in a nondiscriminatory manner, where the processing of the LNP queries threatens to disrupt operation of its network and impair network reliability.

(D) Rate Regulations

The LNP charge per query recovers the cost to query an LNP database on behalf of the N-1 carrier. The rate associated with an LNP query will be billed monthly, per query as set forth in Section 17.4.4(Q), following, based on the recorded number of queries. The Telephone Company will develop monthly charges based on an average number of queries per month if actual query recordings are not available. For billing purposes, each month is considered to have thirty (30) days. (T)

The LNP Order Charge and LNP Billing Charge recover the cost to establish the customer's LNP query account. The LNP Order Charge will be billed per order as set forth in Section 17.4.4(Q), following, to those customers that have ordered LNP Query Service. (T)
The LNP Billing Charge will be applied per account as set forth in Section 17.4.4(Q), following, to the N-1 carrier who terminates non-queried traffic into the Telephone Company's network and has not placed an order for LNP Query Service. (T) (T)

ACCESS SERVICE

17. Rates and Charges (Cont'd)

17.2 Switched Access Service (Cont'd)

17.2.2 Local Transport (Cont'd)

Tariff Section Reference

(A) Common Channel Signaling Network Connection — 6.10.3

(1) Signaling Network Access Link

Rate Band	Monthly Rate: Signaling Mileage Facility Per Mile		Monthly Rate: Signaling Mileage Termination Per Termination		Monthly Rate: Signaling Entrance Facility Per Facility		Nonrecurring Charge: Signaling Entrance Facility Per Facility
1	$2.01	(I)	$20.17	(I)	$38.63	(I)	$353.00
2	$2.44	|	$24.47	|	$46.86	|	$353.00
3	$2.87	|	$28.83	|	$55.21	|	$353.00
4	$3.35	|	$33.65	|	$64.45	|	$353.00
5	$3.80	|	$38.12	|	$73.01	|	$353.00
6	$4.15	|	$41.60	|	$79.67	|	$353.00
7	$4.22	|	$42.35	|	$81.11	|	$353.00
8	$4.85	|	$48.70	|	$93.28	|	$353.00
9	$5.28	(I)	$52.94	(I)	$101.39	(I)	$353.00

(2) STP Port, Per Port

Rate Band	Monthly Rate	
1	$216.73	(I)
2	$262.86	|
3	$309.69	|
4	$361.53	|
5	$409.54	|
6	$446.94	(I)
7	$455.00	
8	$523.25	(I)
9	$568.75	(I)

Tariff Section Reference

(B) 800 Data Base Access Service Queries, Per Query — 6.10.3

Basic	$0.0056
Vertical Feature	$0.0061

Refer to the Local Transport/Special Access Rate Band Table in Section 17.5.1, following, to view company specific rate band assignments.

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17. Rates and Charges (Cont'd)

17.4 Other Services (Cont'd)

17.4.4 Miscellaneous Services (Cont'd)

(Q) Local Number Portability (LNP) Query Service

(1) The Telephone Companies listed below offer Local Number Portability Query Service under the provisions specified in 13.14.2 preceding.

Company Name	State	Study Area Number	Rate Per Query	LNP Order Charge	LNP Billing Charge	
Blountsville Telephone Company, Inc.	AL	250282	$0.0033	$211.00	$268.00	
Brindlee Mountain Telephone Company	AL	250283	$0.0020	$211.00	$268.00	
Brandenburg Telephone Company	KY	260398	$0.0016	$263.00	$375.00	
Cameron Telephone Company	LA	270425	$0.0037	$52.00	$71.00	
Champlain Tel. Co.	NY	150077	$0.0040	$74.00	$107.00	
Germantown Telephone Company, Inc.	NY	150097	$0.0043	$112.00	$141.00	
GTA Telecom, LLC	GU	663800	$0.0031	$65.00	$75.00	
Hopper Telecommunications Co., Inc.	AL	250300	$0.0021	$211.00	$268.00	
Lexcom Telephone Company	NC	230483	$0.0027	$31.25	$233.00	
Lincolnville Networks, Inc.	ME	100003	$0.0062	$105.00	$120.00	(T)

ACCESS SERVICE

17. Rates and Charges (Cont'd)

17.4 Other Services (Cont'd)

17.4.4 Miscellaneous Services (Cont'd)

(Q) Local Number Portability (LNP) Query Service

(1) The Telephone Companies listed below offer Local Number Portability Query Service under the provisions specified in 13.14.2 preceding.

Company Name	State	Study Area Number	Rate Per Query	LNP Order Charge	LNP Billing Charge	
Margaretville Telephone Company, Inc.	NY	150104	$0.0060	$198.00	$261.00	
Mid-Plains Telephone, Inc.	WI	330881	$0.0032	$40.00	$274.00	
Missouri Valley Communications, Inc.	ND	382247	$0.0020	None	None	
Newport Telephone Company, Inc.	NY	150107	$0.0029	$158.00	$245.00	
North Central Telephone Cooperative, Inc.	TN	290573	$0.0014	$245.00	$385.00	
North State Telephone Company d/b/a North State Communications	NC	230491	$0.0011	$44.00	$328.00	
Ontario Telephone Company, Inc.	NY	150112	$0.0322	$135.00	$214.00	
Otelco Telephone LLC	AL	250312	$0.0014	$211.00	$268.00	
Penasco Valley Telephone Cooperative, Inc.	NM	492270	$0.0061	$160.00	$280.00	
Planters Rural Telephone Cooperative, Inc.	GA	220378	$0.0032	$63.00	$106.00	
Shenandoah Telephone Company	VA	190250	$0.0021	$22.00	$54.00	
Telephone Service Company	OH	300659	$0.0020	$96.00	$306.00	
Tidewater Telecom, Inc.	ME	100003	$0.0062	$105.00	$120.00	
Trumansburg Telephone Company, Inc.	NY	150131	$0.0049	$135.00	$214.00	
Windstream Accucomm Telecommunications, Inc.	GA	220395	$0.00429	None	None	(D)
Windstream Georgia Telephone, Inc.	GA	220364	$0.00429	None	None	(D)

ACCESS SERVICE (N)

17. Rates and Charges (Cont'd)

17.4 Other Services (Cont'd)

17.4.4 Miscellaneous Services (Cont'd)

(Q) Local Number Portability (LNP) Query Service (Cont'd) (N)

(2) The Telephone Companies listed below offer Local Number Portability Query Service under the provisions specified in 13.14.2 preceding in the identified wire centers. (M)

Company Name	State	Study Area Number	Rate Per Query	LNP Order Charge	LNP Billing Charge
Reservation Telephone Cooperative	ND	381632	$0.002	None	None

Wire Centers
ALXNNDBCRS2
WTCYNDBA84G (M)

Certain material currently found on this page previously appeared on 6th Revised Page 17-37.5.

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